

Nursing.
SOUTHERN DISTRICT REPORTERS, P.C.

something wrong. And I point out to you, the records will show

Opening - Mr. Jacobs

79OABAR2ps

that money was drawn out of the account from only one check

Listen to all of the evidence, as the Judge has told

that was deposited in the account.

you, listen not only to the direct testimony, but to the

cross-examination of every witness, to determine for yourselves

follow your oath and give Ebony Worthy a fair and just trial in

this case. Thank you.

THE COURT: OK. Call your first witness.

where the truth lies in this case. And I'm sure you will then

MS. PERRY: Your Honor, the government calls Natasha

having been duly sworn, testified as follows: MS. PERRY: May I inquire, your Honor?

Q. How old are you, Ms. Singh? What do you do for a living?

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Currently I'm in school.

For what?

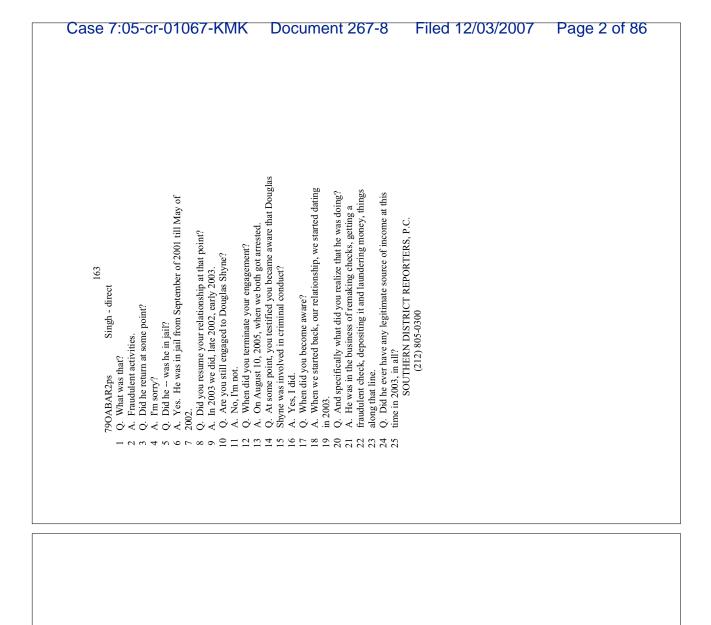
DIRECT EXAMINATION

BY MS. PERRY: 32 years old.

THE COURT: Yes.

called as a witness by the government,

NATASHA SINGH,



on Fifth Avenue in Manhattan. He had a telephone number, a 221 Q. What did it do? A. There was just like a shell corporation. He had a mailbox

number supposedly for this office, but then it gets flashed to Q. What did Douglas Shyne use the shell business for?

his cellphone if you were to call that 212 number.

Q. Did that business conduct any business whatsoever? Any

legitimate business whatsoever?

A. No, it did not.

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Singh - direct

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A. As a front to do his fraudulent activities. Q. Did you know in 2001 that he was involved in fraudulent

A. I dated him for a few months in 2001, and then again we

A. No. Q. Did you begin dating him in 2001? A. Yes, I did. Q. How long did you date Mr. Shyne?

activity?

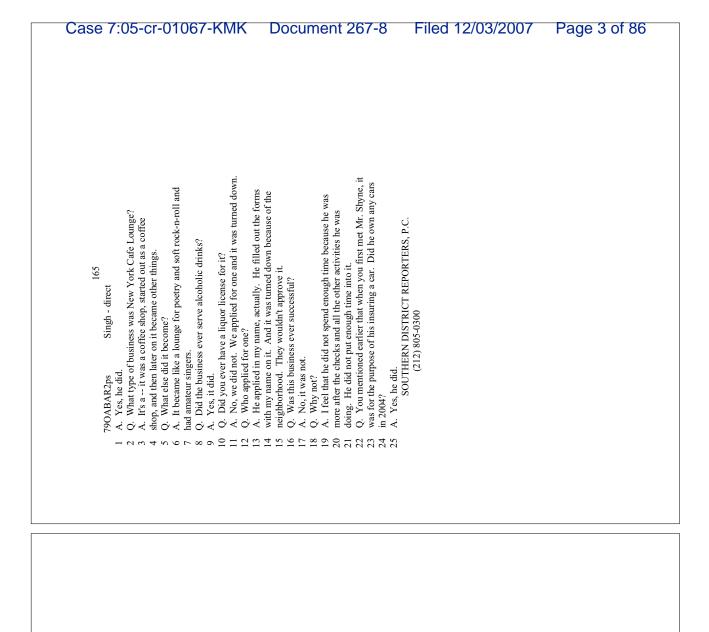
Q. Why was your relationship interrupted in 2001?

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started dating around 2003. He was arrested. At the time, no. SOUTHERN DISTRICT REPORTERS, P.C.

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Did you later learn what he was arrested for? Do you know what he was arrested for?



Did you have any involvement with the New York Cafe Lounge?

Yes. Later in 2004, when I moved down to New Jersey, I

Whose name was this business operating under?

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It was under John McNair.

Who is John McNair?

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started going there and opening house.

It was an assumed identity that Douglas Shyne used?

It's a person who he used their identification.

Q. It was an assumed to the second of the se

Q. What kind of a lifestyle did he have?
A. A very fancy lifestyle.
Q. Did he have any business ventures that were legitimate?
A. Yes. He, he was traveling back and forth from New York to Philadelphia trying to do construction for a cafe that he was

Did he eventually open that up cafe?

trying to open up. Yes, he did. It was New York Cafe Lounge. Yes, it was in Philadelphia.

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What was the name of it? Was it in Philadelphia?

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A. No, he did not.
Q. How was he supporting himsel??
A. Through those fraudulent checks and fraudulent activity.

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Singh - direct

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 4 of 86 would be available? What money was he looking to see if it was A. Correct, or whoever -- whoever they coming through, if they their account, that person would give their account information then exchange account information. Then he will give me that Q. How did you -- I'm sorry. Moneys available. What money the money is available, you know, the person is being truthful A. Douglas, he had -- he had friends that would recruit other available amount. I would type names on the checks for him, A. Well, if he were to give someone -- if someone agrees to Q. You mentioned that you had called banks. What was the Q. So if a person agreed to deposit a fraudulent check into information with the bank to call up in a few days to see if A. He will want to know like the balance or if a check has coming through a friend of his or a family member of his, deposit a check into their account for him, he -- they will people to deposit checks into their account as well.
Q. Did Douglas ever recruit people himself?
SOUTHERN DISTRICT REPORTERS, P.C. Q. What do you mean, "coming through a friend"? been cashed or money is available, things like that. Singh - direct whoever the contact person was. (212) 805-0300 purpose for doing that? things along that line. to Douglas Shyne? to him or not. available?

A. It was under John McNair's name.
Q. Do you know what the monthly payment that was owed for this

Did he ever pay forward on his monthly allocations for the

Somewhere between 16 and 17 hundred a month.

car was?

Q. At some point, did you yourself become involved in Shyne's

fraudulent activity? A. Yes, I did.

Through fraudulent proceeds. Q. How did he pay for the car?

Yes. He does that a lot.

car? Ä

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Q. What did you do specifically:
A. I would call up banks to find out balances of accounts,
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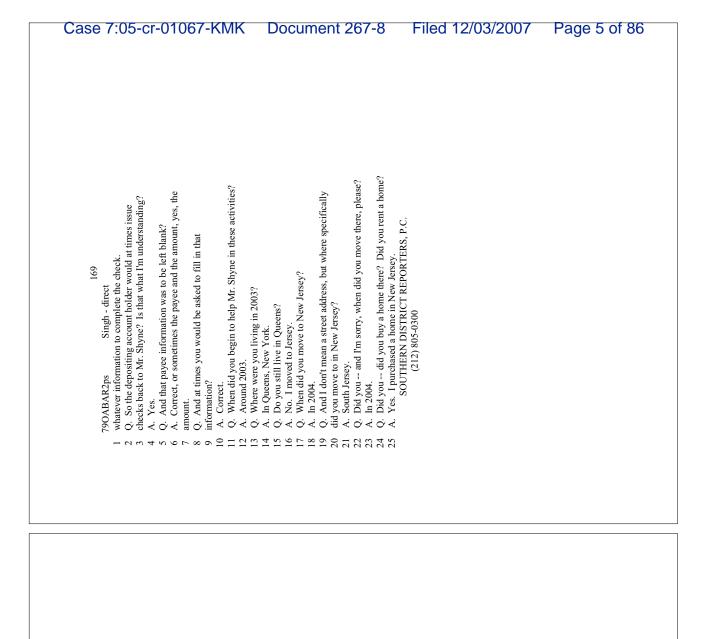
Q. And how about in 2004? Did he own any cars at that point?
A. In 2004, he had a Maserati Spider, a black Maserati spider.
Q. Did he own this car?
A. No. It was leased.
Q. Where was the lease account held for this Maserati?
A. Chase Manhattan Bank.
Q. Was it in under his own name or someone else's name?

Q. Let me just backtrack. When he applied for insurance for

Singh - direct

that car, what was the name -- I may have asked you that A. It was under Douglas New York Five Star Coffee.

question -- that he applied for?



Q. And how would you get that information, the PIN number and

 A. Douglas will get that information from the person or whomever he has recruited that person for him.
 Q. You said he would call automated systems.

the account information?

the automated system.

A. It will be through the automated system. He would have the

person's account information, PIN number, to access it through

find out account information, or balance information, how were

you able to get that information? When you would call the

A. Yes, family and friends of his.

Q. We'll get back to you, but when you would call a bank to

Q. You mentioned also that you would at times write checks for

him, I believe you said?

A. Yes.

A. Yes. Q. Specifically 800 numbers? A. Yes.

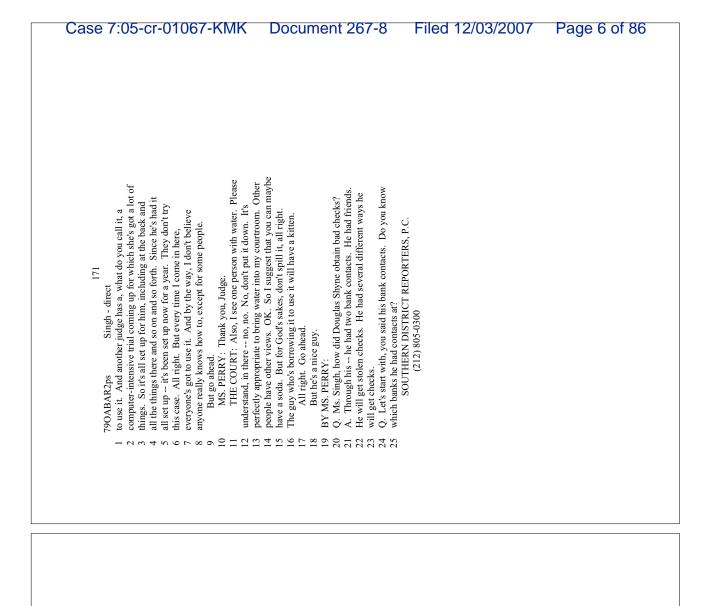
the money back, they will give him a check. Sometimes if it's a business, the checks are in type, just the person's name, so then he will have me then type, type the person's name or SOUTHERN DISTRICT REPORTERS, P.C.

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agrees to deposit a check for him and in return for him to get

A. If he gets a business, if someone in the business coming

Q. Could you please explain what that means.



THE COURT: You're moving on to a new topic right now?

different ways in which you would obtain bad checks?

Q. I'm going to ask you some specific questions about those fraudulent checks that Mr. Shyne received. What were the

Singh - direct

Q. Was the house in your name?

A. Yes, it was in my name.

MS. PERRY: Your Honor, is it acceptable to your Honor

if our paralegal, Rob, sits over there to sort of drive the

me. OK. You may not need it, but, see, when you get a little

(The jury left the courtroom)

older... OK, kids.

(Jury not present)

It's almost 3:30. I don't want you to have any problems with

OK, ladies and gentlemen. We'll take our break now.

MS. PERRY: Yes, your Honor. THE COURT: OK. We'll wait.

THE COURT: I assume those computer screens in front

of you there are blank. Am I correct?

(Jury present)

over there.

A VOICE: Yes.

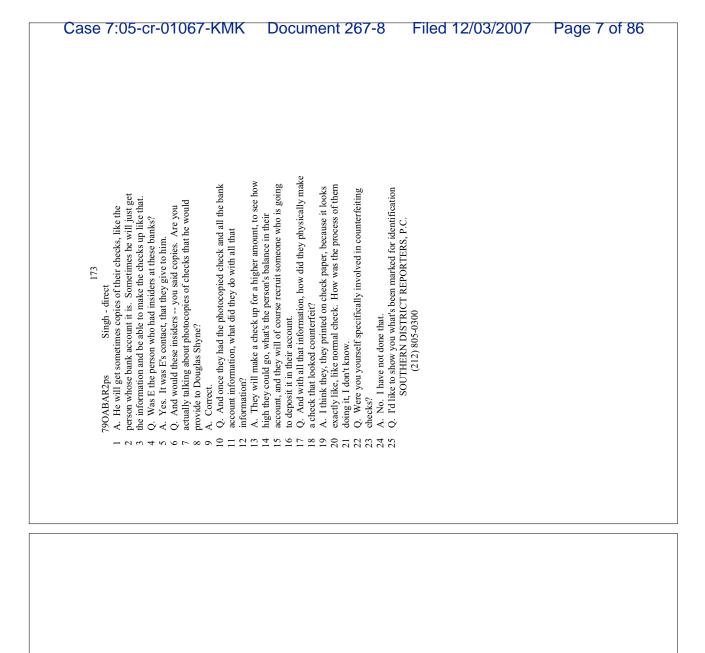
MS. PERRY: OK. Just to let you know that's why he's

THE COURT: I don't care where he sits at.

computer?

THE COURT: This is my courtroom, except I don't get SOUTHERN DISTRICT REPORTERS, P.C.

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Q. How would E get -- would E get actual checks through this insider, or just information with which he can make up checks?

No, I don't know his real name. Q. Do you know E's real name?

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Q. What kind of information did he get from these people?

A. Everything he needs to access their account, like their
Social Security number, account number, balance, sequence of

Q. Where were these bank insiders -- you said Wachovia and

checks, everything that he will need to have to access their

account.

Philadelphia. Commerce, I'm not sure what his contact was

Commerce was in Phil -- I'm sorry. Wachovia was in

Commerce, but in what city?

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Q. What would he do with the bank information, the bank account information, he would get from his bank insiders?

A. He will take it and then have his friend make a check just

Q. Was there a specific friend who would make counterfeit

like a person's check for a high amount.

A. Yes. He had a friend in Philadelphia. His name, he is

called by "E. checks?

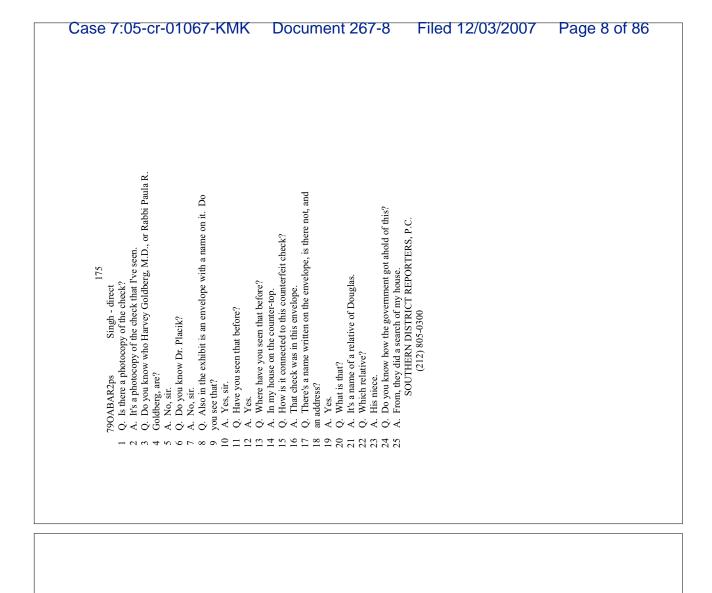
Someone who works in there, in the bank, that would give

him information on this account.

What do you mean by "contacts" with these banks?

A. Wachovia and Commerce Bank. Q. What do you mean by "contacts'

Singh - direct



A. Yes. I've seen this check around.

MS. PERRY: Your Honor, the government offers Exhibit

Q. Have you specifically seen this check before, that is,

Government Exhibit 1312?

A. This is a copy of what he would get from this, his bank

Q. Do you recognize Government Exhibit 1312?

A. Yes, I do. Q. What is that? insider, a copy of a person's check that has all the

information on it.

MR. STOLAR: May I take a look at it, perhaps have a

THE COURT: Sure. Go ahead.

voir dire, Judge?

VOIR DIRE EXAMINATION

BY MR. STOLAR:

someplace?

Q. Ms. Singh, is this the particular check that you saw

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MS. PERRY: Your Honor, I have a number of exhibits.

Can I just hand them all up at this time?

THE COURT: Yes.

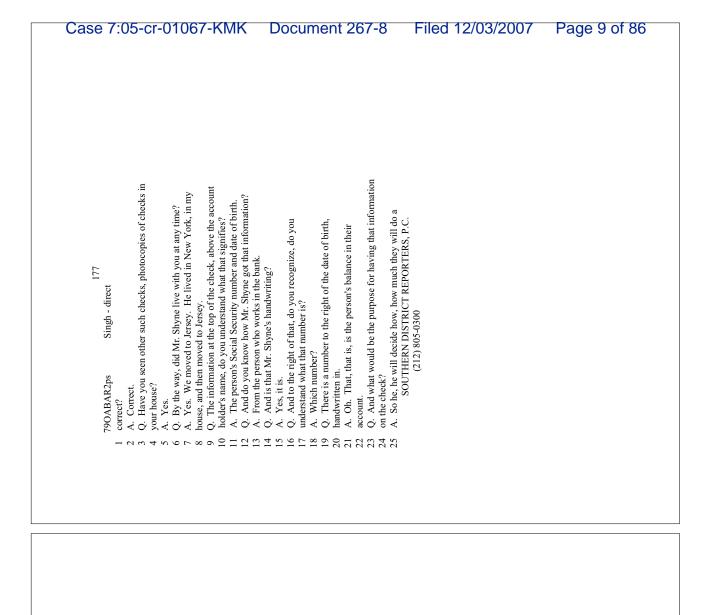
MS. PERRY: May I approach, your Honor?

THE COURT: Sure.

Singh - direct

as Government Exhibit 1312.

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Q. Ms. Singh, what's been marked as Government Exhibit 1312,

DIRECT EXAMINATION (Cont'd)

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BY MS. PERRY:

the original that you have there, is that a real check, or is

that a photocopy?

A. It's a copy.

Q. And what you saw in your house, did you see this type of

check? Did you see a photocopy or a real check?

Q. You mean the photocopy, this photocopy?

A. I saw this same check in my house.

Q. So is this photocopy what you've been talking about, that Douglas Shyne will get from insiders of the bank? He'll get

photocopies of the checks?

Q. I just want to go through some of the information that's listed on this check. This is the Wachovia-issued check, SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

MS. PERRY: Can you please publish Government Exhibit
THE COURT: You want to show it to the jury? Sure, go

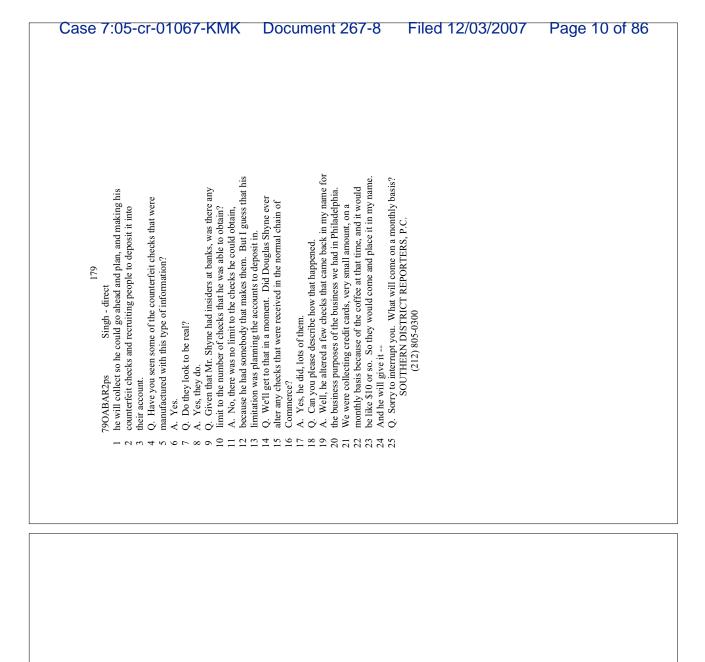
(Government's Exhibit 1312 received in evidence)

THE COURT: Marked in evidence.

MR. STOLAR: I have no objection, Judge. MR. JACOBS: No objection, your Honor.

Singh - direct

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What was done? Why did Douglas Shyne have documents in his

Q. Ms. Singh, what would he do to the photocopies of checks

From the person who works in the bank

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A. Correct. Q. And where would he get that information?

such as the one that is Government Exhibit 1312?

A. I'm sorry. Can you repeat the question?

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possession such as the document that you hold in your hand as

A. This is how he does his business. This is the information

Government Exhibit 1312?

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(212) 805-0300

That's the number given without a date where he would start

Do you know what that number signifies?

number. A. Yes. Q. Do y

And do you see, is the check sequence number in the upper

Q. Do you know -- underneath that, there's a handwritten

Q. In other words, they would do the counterfeit check for

less than the total balance in the account?

A. Yes, to make sure, correct.

Q. And do you see right-hand comer?

A. Yes.

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counterfeit check for.

Q. In other words, for the counterfeit check, they would make

his check number.

it for a different sequence number?

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 11 of 86 Q. You mentioned also that one of the ways Mr. Shyne got bad A. Yes.
Q. Any specific stolen checks, do you recall?
A. Yes. There was a huge stolen check that he received from A. Tracey, I'm not sure. She doesn't have the same last name. checks was, he would receive stolen checks. Is that correct? Were you friendly with Toybe Bennett? SOUTHERN DISTRICT REPORTERS, P.C. How did Douglas and Toybe know one another? When did you first meet Toybe Bennett? Were Douglas and Toybe close friends? Toybe is a long-time friend of Douglas. Do you yourself know Toybe Bennett? A. Toybe is a long-time friend of Dougla
1. Q. What's Toybe's last name?
2. A. Toybe Bennett.
3. Q. How did Douglas and Toybe know on
4. A. I was told by Douglas from prison.
5. Q. Was this in 2001 or some other time?
6. A. Some other time.
7. Q. Was Douglas in prison prior to 2001? Was Douglas in prison prior to 2001? Was this in 2001 or some other time? Singh - direct Yes. They were very close. (212) 805-0300 She has a different name. Q. Who was Toybe? Yes, I did. ÖÆ Ä

Q. So American Express would issue a check to you or the business for a low dollar amount, and Mr. Shyne would take that

and to a different payee.

check and have it remade for a higher dollar amount.

A. Correct, on a different payee. Q. With a different payee?

A. Yeah.

A. The checks, it would come from like American Express, and be American Express, but it will be remade for a higher amount

Singh - direct

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he will then give the check and have it remade. It will still

refund check. And he also had that remade for a higher amount.

Frank is a friend of his, of Douglas.

Whose friend?

Frank is a friend of Douglas.

I'm sorry?

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What's Frank's last name?

Rodriguez.

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Q. How did they meet?
A. I was told by Douglas that they met in business in

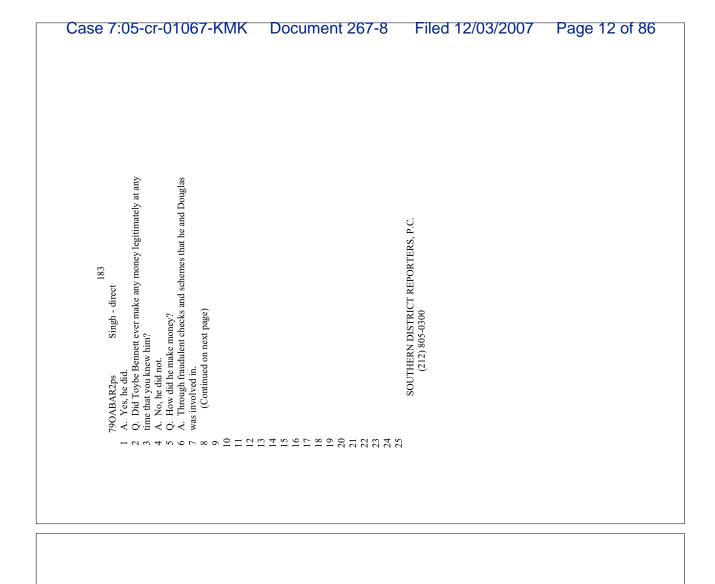
Philadelphia.

What's Frank's wife's name. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. Was that in 2001 or was that some other time?A. 2001.Q. What's Frank's wife's name.

Q. Are there other examples when that occurred? A. Yes. His friend also, Frank, his wife, would receive a



A. No. Tony Bennett used Dmitri Mackevich.
Q. Was that an alias that he used?
A. Yes, it was.
Q. Did E have identification in the name of Dmitri Mackevich?
SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

In opening up that account at Morgan Stanley, did Toybe

Bennett use his real name? Column, C-o-l-u-m-n. Column Financial?

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1 A. Yes. I was very friendly with him.
2 Q. How big was that check that Toybe Bennett got his hands on?
3 A. 775,000.
4 Q. Where was that stolen from?
5 A. It was a company in Manhattan. It's no longer working in the middle of -- it was a friend of Toybe's that worked.
7 Q. Were Douglas and Toybe able to cash out that stolen check?
8 A. Yes. They were able to cash most of it out.
9 Q. And how did they do that?
10 A. They opened up an account in Philadelphia under the same

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Singh - direct

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payee's name. Like the check was made out to Column Financial. So they opened up a working standing account under the name

Column Financial. And Toybe was the owner of the account.

MR. STOLAR: Did Toybe use -- the word is what

MS. PERRY: Column. MR. STOLAR: C-o-l-u-m-n.

Financial?

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 13 of 86 THE COURT: Sure. Do you recognize Government Exhibit Q. Does that refresh your recollection as to what phone number he used during 2004 and 2005? A. No. It was in my name. Everything he had was in my name. Q. I'd like to show you what's been marked for identification Q. What -- do you recall Douglas Shyne's phone number during change phones a lot. But that was the number he used for the as Government Exhibit 1309 and ask you if you recognize it. (347)256-3229, did he use that number in 2004 and 2005? Q. Did Douglas Shyne have his phone in his own name? By the way, the number you gave for Toybe Bennett, A. I don't remember if he used it all along because they THE WITNESS: Yes. That's T-Mobile, with my Q. But you know A. Yes.
Q. What number did you use in 2004, 2005?
SOUTHERN DISTRICT REPORTERS, P.C. information on it, and Douglas' telephone number MS. PERRY: May I approach, your Honor. 185 Singh - direct A. (914)433-3413, I think, or 3433. It's (914)433-3643. What is that? longest time. A. Yes. Q. What 1309? Ö

You said you were close with Toybe Bennett. Did you ever

speak on the phone with him?

Yes, I did, a lot.

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Do you know where he lived with Ebony? One was Donna and the second, Ebony.

He had more than one girlfriend.

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Who was his girlfriend?

O. Do you know any of their names?
A. One was Donna and the second, Eboi
Q. Do you know where he lived with Eb
A. It was somewhere upper Manhattan.
Q. Do you know Ebony's last name?
A. No, I don't.
O. You said you were close with Toybe It was somewhere upper Manhattan.

Do you remember what his phone number was in 2004?

A. I think the last four is 3229. If I see something, I

probably recognize it, the last four is 3229.

Q. Do you remember the prefix?

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(212) 805-0300

Is there something I could show you?

That was for his cell phone number.

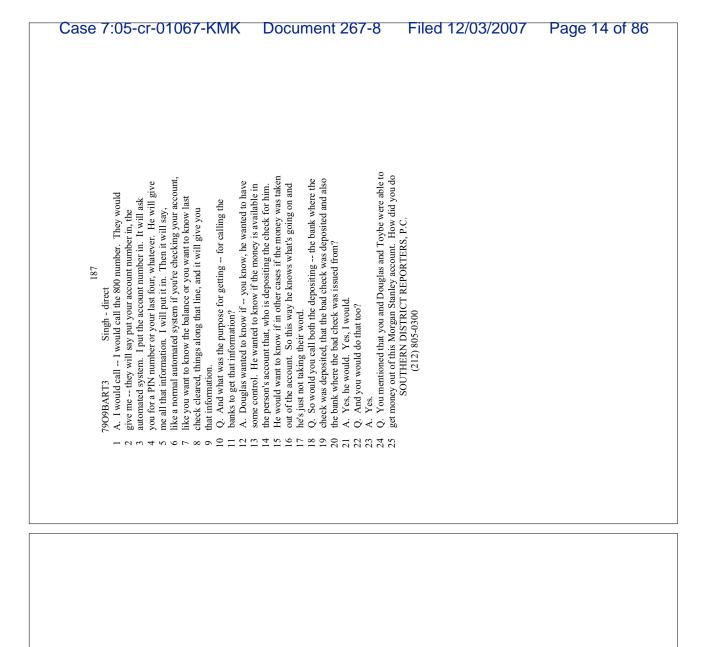
places. He lived at my house. He lived at my mother's house. He lived at his cousin's house in Brooklyn. And he lived at his girlfriend's house. A. For the short period of time I knew him, he lived several

A. He liked nice things, but not as flamboyant at Douglas.

Where did Toybe Bennett live?

Q. What type of lifestyle did he live?

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When you would call the 800 numbers on behalf of Douglas

Shyne, could you just please, just describe exactly what you

would do and why you would do it? SOUTHERN DISTRICT REPORTERS, P.C.

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did you speak with a person or was this an automated system?

A. When I called I spoke to a person.

This is different. When you called Morgan Stanley,

did, you would call the automated systems.

talking about calling banks to get balance information, and I just want to make sure it's -- that it's clear what exactly you

By the way, I want to get back to -- earlier you were

A. Yes.
Q. And you pretended to be Mrs. Mackevich?
A. Yes.
Q. By the way, I want to get back to -- earlier.

A. I called the person at the bank that Toybe was dealing with

Q. What did you do? A. Yes, I did.

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stocks or something along that line, to liquidate the money. and pretended I was Toybe's wife to ask them to settle the

So that was to get funds released?

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A. (917)941-6205.

Q. I want to get back to the stolen check that you mentioned

Singh - direct

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that Toybe Bennett got from Column Financial Company in

Manhattan. check?

Did you do anything to assist in cashing of this

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 15 of 86 account, and also he would have them send a check to a company Shyne received bad checks, how would he typically get proceeds Q. By the way, do you know a person named Shannon Quintal? A. They would recruit people to deposit the checks into their many different ways he would get proceeds.

Q. You said they would recruit people. Who would recruit Q. So, on the topic of cashing out proceeds, when Douglas that he has bills or a leased car to, he would get cash; so Did Douglas himself ever recruit people? SOUTHERN DISTRICT REPORTERS, P.C. Yes. I know Shannon, a friend of my sister's. A. Yes. I know Shannon, a friend of my si Q. Good friend?
A. Yeah, good friend.
Q. Is she involved in depositing proceeds?
A. Yes.
Q. Or I'm sorry, depositing bad checks? Yeah, good friend. Is she involved in depositing proceeds? A. Yes. I heard that she did some checks. people to deposit checks in their account? Singh - direct Douglas and Frank and Toybe --(212) 805-0300 -- whoever they know. And Toybe Bennett? Frank Rodriguez? This is Frank -from the checks? A. Yes. Q. And Ä Ą Ó

their commission or their fee that Douglas and Toybe agreed to

Q. They would keep a fee for having done that service? A. Yes, because they took some checks. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. They would then return cash to Douglas and, or Toybe, less

check into their account, what did they then do?

Once all those individuals deposited proceeds of the stolen

Nathaniel Shyne.

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A. Ephraem Richardson.
Q. You mentioned Toybe's cousins. Who were they?
A. Cynthia and Roberto Montgomery.
Q. And once these people, your mother, your brother -- what's Douglas Shyne's brother's name?

A. Well, through deposited -- writing checks from the Morgan

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Singh - direct

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along that line, whoever agreed to deposit a check into their Stanley account to friends and family, girlfriends, everyone

Q. Who were some of those people who agreed to deposit

account, because of the fee.

proceeds of that stolen check into their accounts?

A. My mother, my brother, Douglas' brother, Toybe's cousins.

and friends.

My mother is Christine Richardson.

Q. What's your mother's name? A. My mother is Christine Richs Q. What's your brother's name?



Q. And when a person would deposit a proceeds check into their

account, how would the money typically get back to Douglas

A. If they depositing it through Frank or Toybe? Is that your

question? Q. Yes.

Shyne?

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

situation where, you know, he's getting a problem with getting THE WITNESS: No. He doesn't like to deal with them

because they coming through Frank and Toybe, unless it's

the money, then he would. But no, he doesn't really like to

deal with them.

Go ahead. Answer the question. Do you want it read back to

THE WITNESS: No, thank you.

yon?

THE COURT: Go ahead.

MS. PERRY: Your Honor, this is based on --THE COURT: No. I'll permit it. It's all background.

MR. JACOBS: Objection. Hearsay

Q. And when Toybe and Frank acted as a broker for him to recruit people, did he typically deal with the people that Toybe and Frank had arranged to deposit checks?

A. Yes, my family and his family.

Q. And when he would recruit people to deposit proceeds

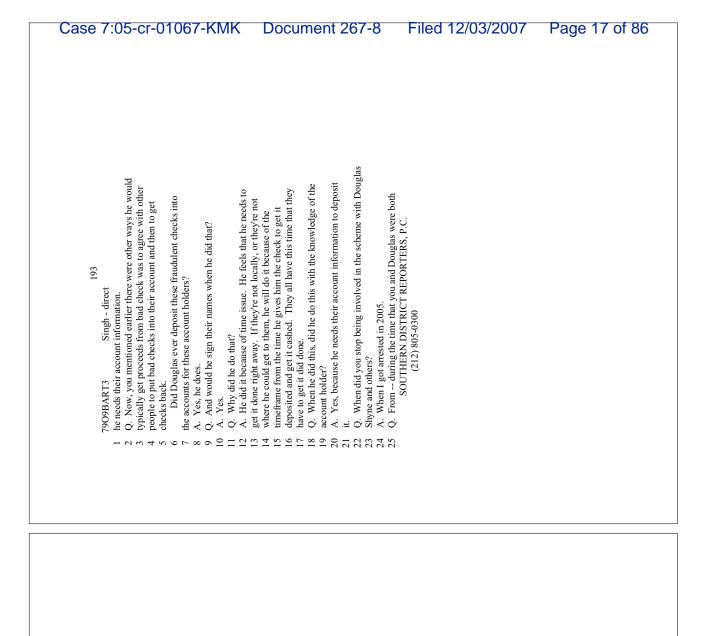
Singh - direct

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checks, did he deal with those people directly?

A. Yes.



 Q. Did -- were bank accounts ever opened -- did Douglas ever open bank accounts in assumed identities to deposit fraudulent

So essentially you stole that money?

Yes.

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checks? A. Yes.

Q. And you used the credit card?A. Yes, I did.Q. So essentially you stole that m

Q. And what did you do with that identity?

A. I gave it to Douglas. He opened up an online account and

credit card under Beatrice Rodriguez and I used it.

Q. Was there ever any occasion when you used anyone else's identity?

A. Yes. I used Beatrice Rodriguez's identity.

Where did you get that identity?

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A. From my old job.

A. I used my own identity to conduct business.

someone else's to conduct business?

Q. Did – for the most part, did you use your own identity or

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Singh - direct

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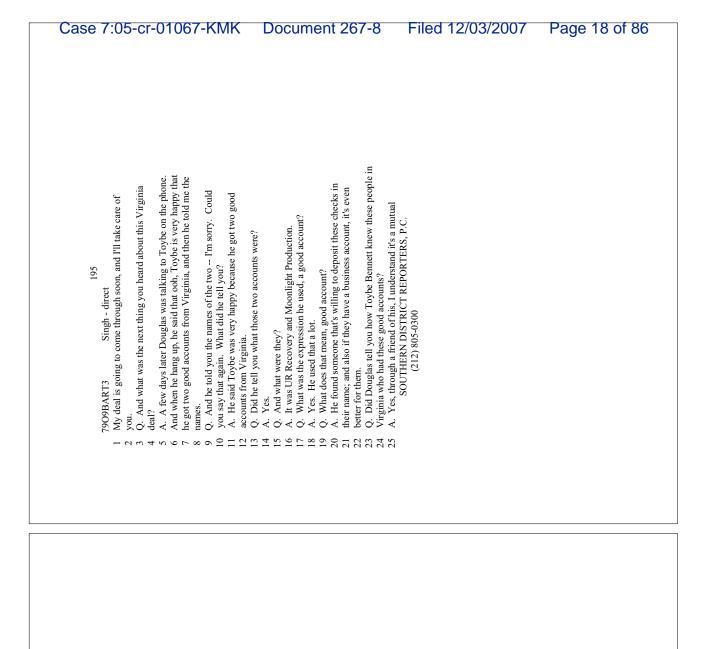
people's names and his photograph?

Q. Did he ever use any with preexisting account without their

knowledge?

need their information to have control to check their account, SOUTHERN DISTRICT REPORTERS, P.C. A. No. He couldn't do that. He wouldn't do that because he

(212) 805-0300



Q. And when was this conversation between Roberto Montgomery

And is Roberto Montgomery someone that you mentioned

earlier, someone that Toybe worked with in depositing bad

checks? A. Yes.

Well, he didn't say exactly to me. He was helping me move

and he and his cousin were having a conversation, and I was

right there in the next room. Roberto Montgomery. Who was his cousin?

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A. Well, I heard about it from Douglas. But I heard there was

Q. How did you first hear about this company?

A. Yes, I did.

accounts in Virginia from Toybe when I first heard about.

Q. What did Toybe tell you?

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Q. Ms. Singh, have you ever heard of a company called UR Recovery?

A. Yes. He made a lot of money. Oh, in the millions.

money was made from these bad checks?

helping me move. And Roberto said to Toybe: All these things

you have me doing for you, you really owe me.

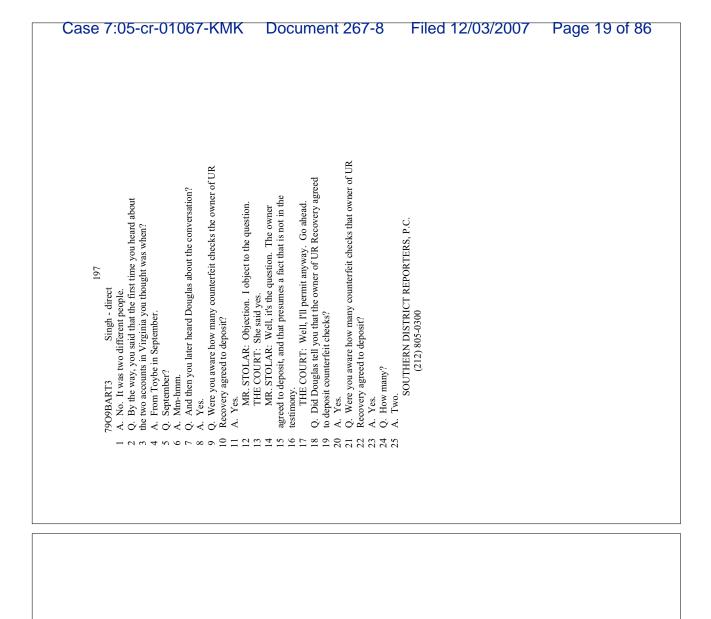
A. It was around August of 2004, in my house, they were

and Toybe Bennett?

And Toybe said to him that: Don't worry. I got you. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

involved in this fraudulent check scheme, do you know how much



A. No. Q. There was a couple. Did you know it was the wife, the same Q. There was a couple.

Q. Did you know their names?

A. A couple.

person that owned UR Recovery?
SOUTHERN DISTRICT REPORTERS, P.C.

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Q. Did you learn who owned Moonlight Productions?

Q. So he used a female pronoun? A. Yeah. He said she.

a fake invoice to be sent.

Q. Did Douglas tell you what type of business UR Recovery is?

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Singh - direct

friend in Brooklyn.

A. A business that repairs credit, people's credit.

Q. Did you know what type of business Moonlight Productions

Q. What kind of business was it?

A. No. Q. Did you learn who owned UR Recovery?

was?

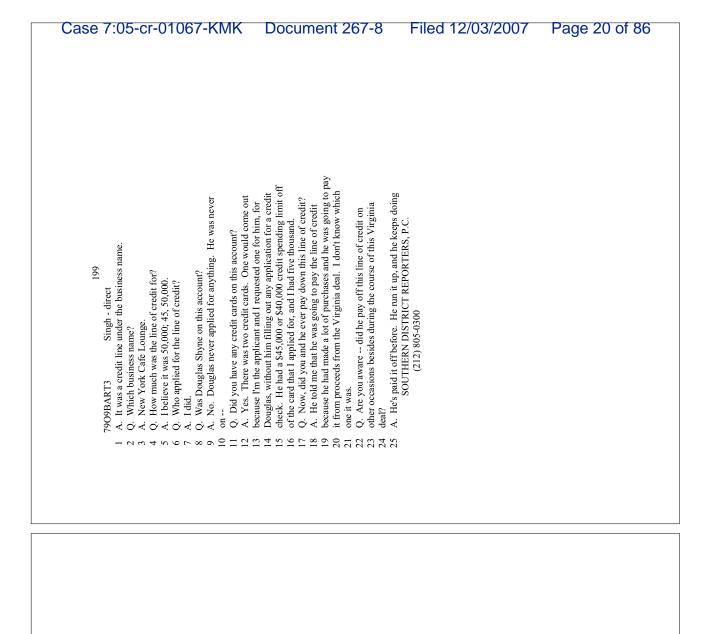
Q. How did you learn that the owner of UR Recovery was a

female?

Q. Do you recall the person's name?

A. I learned it was a female.

A. Because Douglas mentioned that he needs a fraudulent statement, a fake invoice to be sent to -- she's going to need



up because she does not want to release anymore money until she

Q. I'm going to get back to the fake invoices. I'll ask you

receives the fake invoices.

first, did you hold any accounts at Wells Fargo?

A. Yes, I did.
Q. What type of account?

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. He said to me that he needs these fake invoices to be made

What did he tell you about the proceeds?

A. Yes.

Ö

Did Douglas ever tell you whether he ever got any proceeds

A. Douglas.
Q. Did Douglas ever tell you whether he ever got any procee from these two checks deposited in UR Recovery's account?

Q. Were you aware of where those two counterfeit checks were deposited by UR Recovery?

A. One in Philadelphia and one in New York.

Where was that?

A. Yes.

Who deposited those checks?

Ö Ö

Toybe and Douglas. Who told you that?

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A. One is for 80 something thousand and one is a hundred and

Q. Do you recall how big they are?

change -- a hundred and something thousand.

Q. Were you aware of how big those checks were?

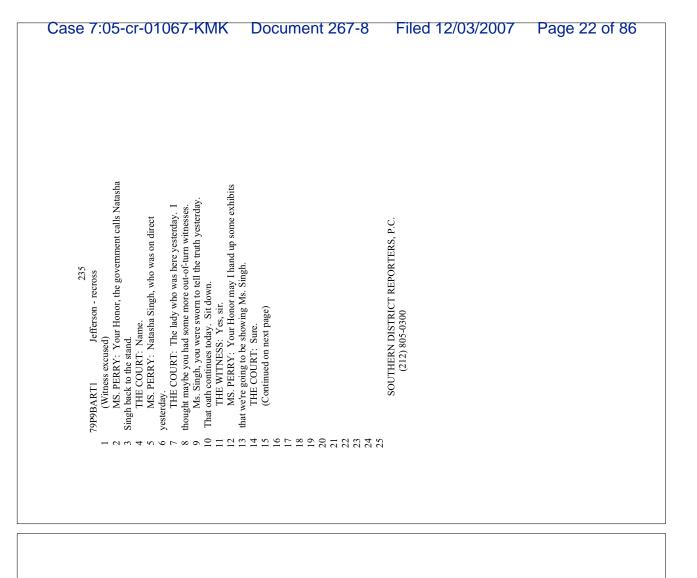
Singh - direct

7909BART3

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 21 of 86 A. To cover herself, God forbid the checks come back, to show would need these invoices for UR Recovery. And then later on that she provided this service to whoever I would make up the he mentioned that she needs it because she's not going to send will probably take a little while with this invoice. Should we deposited and some of the funds were released but not all the A. Correct. And she's requesting the fake invoice to release A. No. A few days earlier he had mentioned to me that he MS. PERRY: Your Honor, just to let you know, this Q. Was this the first time that you and Douglas Shyne had Q. So to your understanding the checks had already been Q. I'd like to ask you to look at what's been marked for identification as Government Exhibit 402 and ask if you SOUTHERN DISTRICT REPORTERS, P.C. Q. Can you identify Government Exhibit 402? THE COURT: You can identify it. THE COURT: This is exhibit 402? MS. PERRY: Yes, your Honor. discussed invoices for UR Recovery? (212) 805-0300 any additional funds. fake invoices for. recognize that? the balance. go forward? funds?

> A. Yes. Q. Did he tell you why the owner of UR Recovery wanted these The problem when he asked me for an invoices, when he said when he makes a payment, it goes because I'm the applicant. If Q. Did you hear about any problems that Douglas Shyne was having with UR Recovery? Q. Why does he use fraudulent proceeds to pay down this line she wants the fake invoices sent to her before she release any A. To have it not traced to him because the card is not in his apply for it with a social security number or anything. So A. Yeah, he got a card in his name. But he didn't have to Q. With what funds does he pay off the line of credit? Q. And he asked you to provide some fake invoices? SOUTHERN DISTRICT REPORTERS, P.C. Who is the "she" that wanted the fake invoices? A. He referred to the owner of UR Recovery. Q. There is a card in his name with you? he doesn't pay it, they coming after me. A. Yes. Q. In what context did you hear this? Singh - direct A. From fraudulent proceeds name. It's in my name. fake invoices? further money. 79O9BART3 of credit? ò

(212) 805-0300



A. Yes, it is. Q. When you prepared the fake invoices, I assume you prepared

Government Exhibit 402 that's in front of you, is that

Q. What is that?A. This is an invoice I made up and give it to Douglas.Q. Is this your handwriting on these two documents, that's Government Exhibit 402?

Singh - direct

79O9BART3

Q. On top of one of these copies there is some, what looks

like pen language. Do you know what that is?

You didn't write that?

A. No. Q. You A. No.

A. Yes.
MS. PERRY: The government offers exhibit 402.
MR. STOLAR: Can I take a look?

THE COURT: Sure.

BY MR. STOLAR:

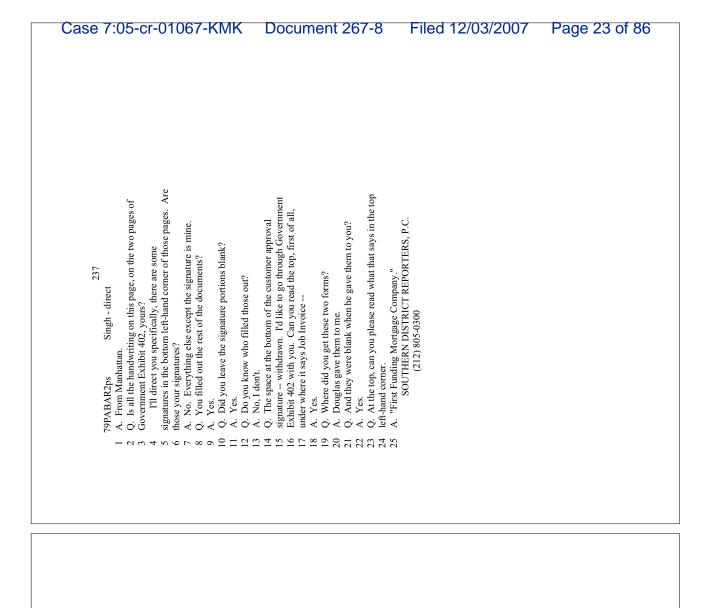
A. No. It's copies. Q. But this is a copy of what you prepared?

an original document?

MR. STOLAR: Judge, if we can get an agreement to

block out the stuff that she doesn't recognize.

THE COURT: Sure.
MS. PERRY: Yes, your Honor.
SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300



Q. Ms. Singh, what's in front of you as Government Exhibit 402

the jury.

THE COURT: Sure. Why not. You can.

is a copy of the original that you actually handwrote?

Did he tell you what he did with them?

A. I gave them to Douglas. Q. Did he tell you what he

What was that?

Ä

What did you do with the originals?

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A. Yes. It's a copy.

MS. PERRY: Your Honor, we've redacted out the portion of 402 that was objected to. We would like to publish that to

Q. And what is that?
A. This was the fake invoices that was made up, copies of it

Q. And it contains your handwriting?

A. Yes.

Mr. Shyne, and Government Exhibit 402 was admitted into Q. Ms. Singh, yesterday we were talking about some fake invoices that the owner of UR Recovery had requested of

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Singh - direct

DIRECT EXAMINATION (Cont'd) NATASHA SINGH, Resumed.

BY MS. PERRY:

evidence. Do you recognize Government Exhibit 402?

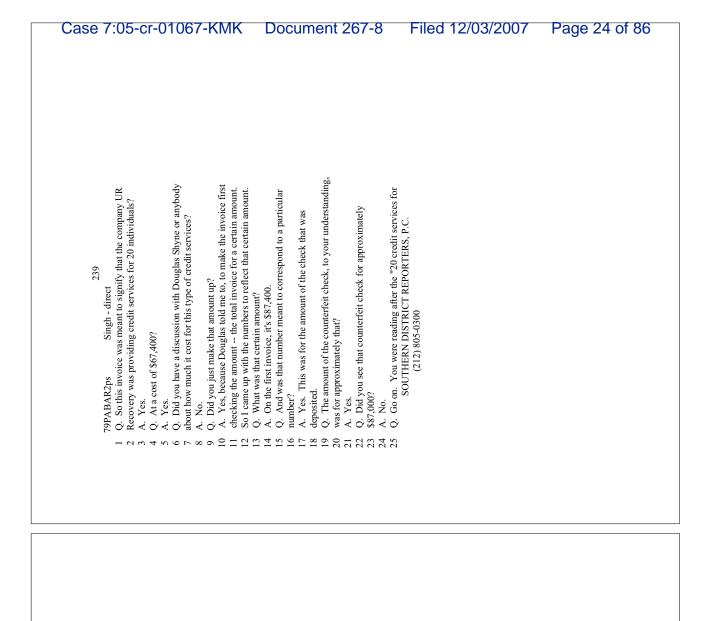
A. Yes, I do.

He Fedexed it to Virginia.

Did he tell you where he was Fedexing the documents from?

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300



Q. How about the name "First Funding Mortgage Company"?

Q. You made that up?

A. Yes.

It's just a name that I put in there. It has nothing to do

Who UR Recovery has provided service to. The customer who they provided service to.

A. The customer who they provided service to?
O. Whom who has provided service to?
A. Who UR Recovery has provided services
O. Who is Winston Shillingford?
A. It's just a name that I put in there. It has
with this, just a name I just put.

Q. What is that address and name supposed to signify?

Q. Continue.
A. "Hillside Avenue, New York, and it was Winston Shillingford.

Singh - direct

79PABAR2ps

"quantity, materials, and amounts." Can you please read that

Q. And underneath that, there are some figures. It says

there.

and tell the jury what that's supposed to -- meant to signify.

20 people servicing their personal credit accounts, and it is

SOUTHERN DISTRICT REPORTERS, P.C.

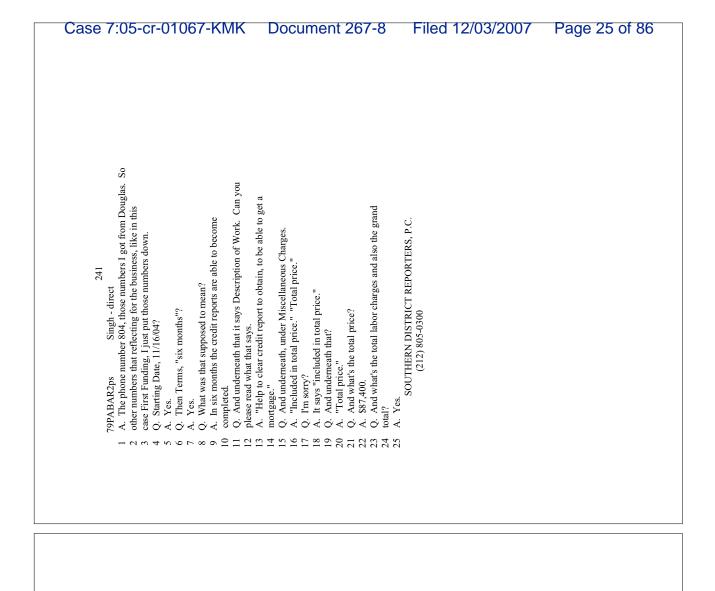
(212) 805-0300

time I did the best I could -- that is kind of like saying it's

accounts, \$67,400." That is - I know it's silly, but at the A. It says "20" and then it has "credit services, personal

because I remembered the name, I just filled the name down

A. It's a company that is on Hillside Avenue that's called First Funding, but they had nothing do with this. I just,



A. Customer order number 0915616. And the phone number is

(804) 343-0033.

Can you read that, those numbers?

customer order number?

A. Yes. Q. Can Q. Where did you get that phone number?
A. I got the phone numbers from Douglas.
Q. Do you know where he got that phone number?
SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

O. And next to that, Order Taken By?
A. "Manager, Chris."
Q. Who is Chris?
A. Just a name I put in there.
Q. And then underneath that there's a phone number and a

O. For how much?
A. Looks like 20,000.
Q. And what does that mean?
A. Five business credit reports.
Q. And can you please explain what that is supposed to mean.
A. They provide services for businesses building credit report

personal accounts." What's underneath that?

Singh - direct

A. "5 business service credit reports."

Q. If you look on the top right-hand comer, it says Date

and it talks \$25,000.

Ordered. What is the date on that?

A. 11/16/2004.

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 26 of 86 that there was the same customer number and phone number for a A. Yes. Q. The phone number on the customer order, are those the same numbers as on page 1 of Government Exhibit 402? A. No. I didn't think anything about that.
Q. Did you give a lot of thought to these before you prepared A. It says "3, 3 businesses, supermarket, credit services with employees, total number, 95 people."
Q. What's the amount listed for them?
SOUTHERN DISTRICT REPORTERS, P.C. Q. And again on the right-hand side next to that, it says Date silly, silly invoices comparing to the amounts and stuff like Q. Did you think about the fact that it was -- would be odd A. Um, not really, because I, I really didn't know much of Q. Can you please read what's listed there under -- in the A. Correct.

Q. This was meant to be for a different company; is that that. Like I said, I just really, basically wanted to get it what I was doing on this. If you look at it, it's really a Ordered, "11/27/04," taken by the manager? over with, so to give it to him, to Douglas. different company on the second invoice? Materials section in the left-hand side. Singh - direct (212) 805-0300 correct? A. Yes. them?

Q. Would you turn to the second page. Who is the customer listed there?

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(212) 805-0300

Where did you get that zip code?

Douglas.

And zip code?

Q. Then A. Yes. Q. And

There's just an address of Richmond, Virginia?

Q. Is there a company name that you see? A. H'm.

A. Christopher Owens. Q. CEO? A. Yes.

felt it was kind of silly. So I just did it for him not to be

bothering with me once he had it.

A. No. Actually, when I completed invoices and I gave it to him, he just took it, then went about his business, and I didn't ask because I, I really didn't know what I was doing. I had no clue how much credit offered and all that stuff, and I

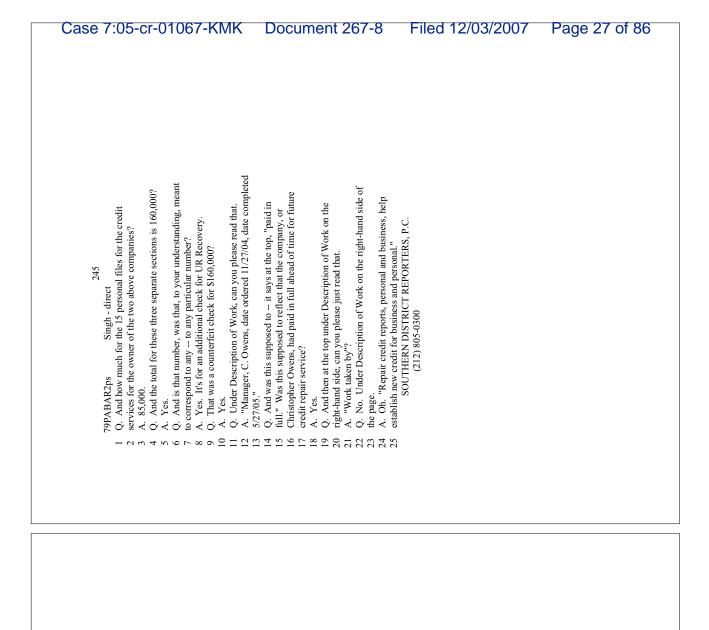
Q. Did you have any discussion with Douglas Shyne about what — about whether or not this invoice made any sense for

the services it was supposed to reflect?

Q. And then finally, there's an asterisk on the left-hand

Singh - direct

side, "Paid in full by check, company check"?



Q. And then finally, underneath that, can you please read it. A. "15 personal files for credit services. The owner of above

Strauss? A. Correct. companies, order total \$160,000."
SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Recovery is providing credit services for 150 clients of R&S

Q. And UR Recovery, is this supposed to reflect that UR

This is right, yes.

No. So this would be for a different business?

And what is R&S Strauss, if you know? It's a company that does, um, car repairs.

It's not a supermarket company.

A. \$15,000.
Q. So to your understanding, was that meant to reflect that UR Recovery was providing credit services for a supermarket with

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Singh - direct

79PABAR2ps

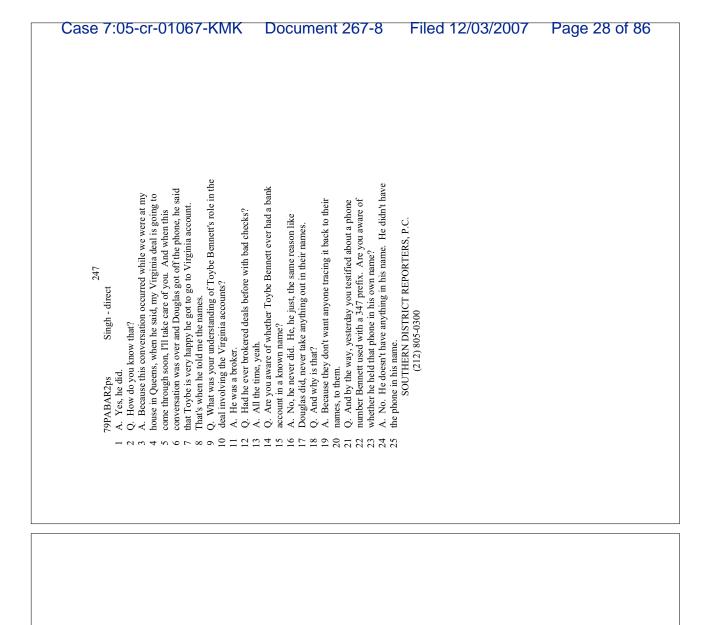
A. "5 locations R&S Strauss. Credit services with managers

and employees total 150, 150 clients." Q. How much was that supposed to be?

Q. Underneath that can you please read what that says.

A. Yes. Q. And the total price for that would be \$15,000? A. Yes.

95 employees?



Q. Did Douglas tell you whether he had received any proceeds

at this point that you prepared these invoices?

A. It was my understanding that at least one was deposited deposited? What was your understanding with respect to two false invoices, was it your understanding that the two

counterfeit checks?

already

A. Yes. He said to me that he needs these invoices made out

They had received some proceeds?

A. Yes.

Ö

because she's requesting it before she release the balance of

the money. She needs these fake invoices made up.

Q. You can put that aside, Ms. Singh.

Q. At the time that Douglas Shyne asked you to prepare these

counterfeit checks had already been deposited or were to be

Q. And then just read what it says just down the page under Miscellaneous, "Charles."

A. Discounted and flat rates for commercial accounts," and then below Total Labor, 160,000.

MR. STOLAR: And the last word?

Q. "For business and personal"?

Singh - direct

79PABAR2ps

Bennett got any proceeds from the counterfeit checks that were deposited to these Virginia accounts you've been talking about? SOUTHERN DISTRICT REPORTERS, P.C.

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On the subject of proceeds, do you know whether Toybe

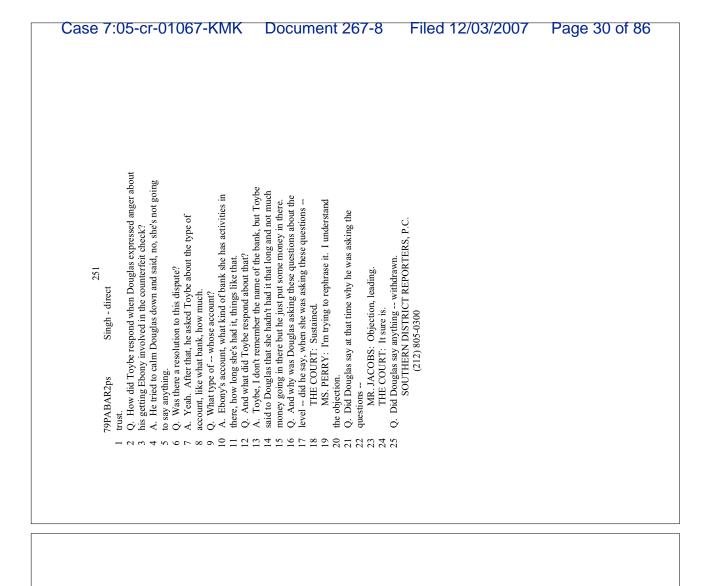
Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 29 of 86 A. Around 2004, or later 2004.
Q. Towards the end of 2004?
A. Yes.
Q. Were you ever present for any discussions between Douglas Shyne and Toybe Bennett about any additional counterfeit checks A. Yes, Douglas was angry. He said to Toybe, you know how I during this same time period that we've been talking about, the Q. And what was the tone of the conversation?

A. Well, it started off angry, and then they calmed down and they came to an agreement. Toybe was asking Douglas for an account of the check for You said the tone was angry. Was Douglas Shyne angry? Q. Do you know when Toybe Bennett started dating Ebony? feel about this. You go, you get another girlfriend involved, with your people. Toybe said to him that, don't worry, she's and you know I don't like this, I don't like to be personal not going to say anything.
SOUTHERN DISTRICT REPORTERS, P.C. his girlfriend, Ebony, to put into her account. What was the conversation about? Singh - direct Where was this conversation? (212) 805-0300 Q. Where was this conversationA. At home in New Jersey.Q. At whose home?A. My home in New Jersey. My home in New Jersey. A. Yes, I was. end of 2004? . o, ∢ Ö

> Q. When Toybe Bennett would get proceeds from bad checks that Q. The fee would be reflective of a commission they were owed for a bad check, how would Toybe go about getting his share of he was involved in, how would he get his portion of the money? Q. And once that person he recruited would put in the proceeds A. Well, let's just say he would choose somebody to -- he find somebody to deposit the check. Then that person will in return Q. Would the check be made out to his own name?
> A. Oh, no. That will be made out to whoever he -- to whoever check, and he will then give friends or family or governments Q. You spoke yesterday about a girlfriend of Toybe's named agreed to have them in their name. Lots of times it's blank A. It would be the person who's depositing the check for give Toybe the cash, less whatever fee they agreed upon, A. He will get it through, through cash, or he will get a SOUTHERN DISTRICT REPORTERS, P.C. Ebony. Do you know Ebony's last name? that check to deposit into their account. Q. Who would put it in? and they would put it in. for doing that service? whatever it was. the proceeds? Douglas.

(212) 805-0300

Singh - direct



Q. Did Douglas say why it was that he was angry about Toybe's

getting Ebony involved in this counterfeit check?

anybody that he doesn't trust to get personal with him. It's a A. Yes. He -- because he does not, he said he does not like

involved. He had a personal relationship with them. But difference when he got my family involved or his family

Toybe's girlfriend he doesn't. And he -- it's a level of SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

MS. PERRY: Your Honor, I'm asking specifically about

MR. JACOBS: What she's --

THE COURT: Sustained. THE COURT: Sustained.

what Douglas Shyne told her, said in this conversation, about

THE COURT: It's not even asked. Go ahead.

MS. PERRY: OK. I will rephrase.

Q. Did Douglas say anything about why he was angry about Toybe

Ebony sometimes was with Toybe.

getting Ebony involved in the counterfeit job?

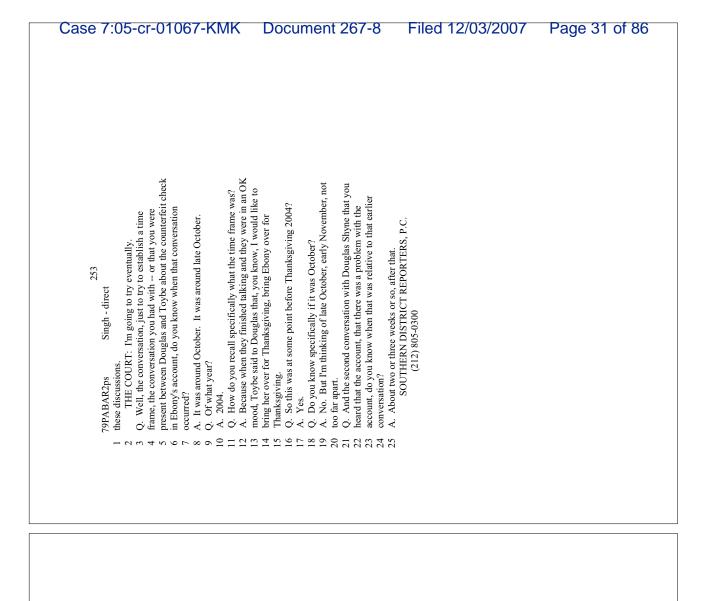
A. Yes. He doesn't like anyone --MR. JACOBS: Objection.

A. Yes, because Toybe was staying with Ebony and he's gone several times to pick Toybe up or pick him up in the city, and

Q. Do you know whether he had met her a number of times?

Q. Had Douglas Shyne ever met Ebony? A. Yes.

Singh - direct



MR. STOLAR: Judge, could we fix some dates on some of SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. Did you have any discussions with anybody else about this

That's the answer to the question.

Toybe. He got off the phone. He was angry. And he said, with

and now because there's a hold on it she's all scared about it.

an angry voice, that -- first, she agreed to deposit the check

 A. No. He didn't say what he meant. But it was an account issue.
 THE COURT: Don't go any further. He didn't say it.

Q. Did he say what he meant by "hold on the account"?

And, you know, he was very upset.

A. A conversation from Douglas. He was on the phone with

Q. What did you learn and how did you learn it?

something small, under 50,000, because her account is not that

strong.
Q. Did he say what he meant by "not that strong"?
A. Yes. Because she had -- she hadn't had it that long and

Q. Did you ever learn that a counterfeit check in fact was

deposited into Ebony's bank account?

A. Yes.

she does not have that much activity in and out of it.

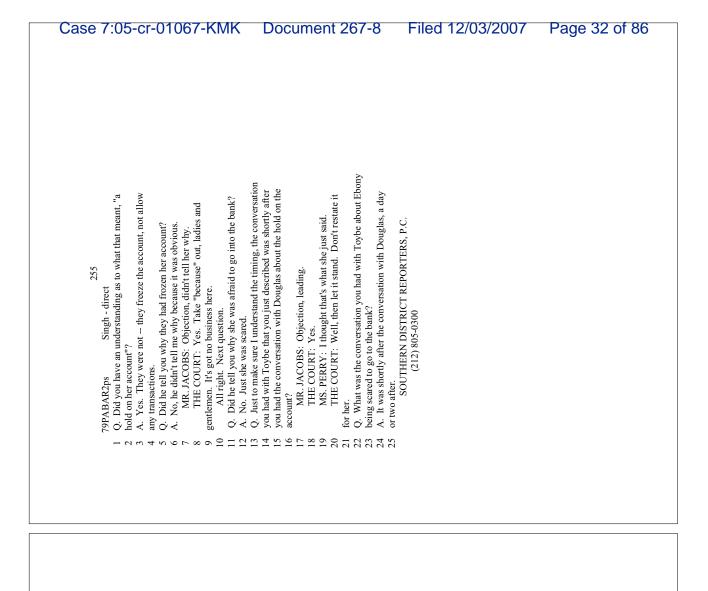
A. Yes. Douglas said to Toybe that it would have to be for

this counterfeit check that they were discussing?

Did Toybe and Douglas discuss a specific amount for

Singh - direct

79PABAR2ps



A. This was around the same time Douglas had that conversation MR. JACOBS: Could we fix a time, please, your Honor?

THE COURT: We can, sure. What time was this?

with Toybe, a few days after. Douglas -- Toybe and I was

talking and he said, Ebony is scared to go into the bank

because they have put a hold on her account and she's scared. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

conversation you had with Douglas Shyne about a counterfeit

Q. Ms. Singh, we were speaking before the break about a check deposited into Ebony's account. Did you have any

MS. PERRY: Thank you, your Honor.

BY MS. PERRY: ahead, Ms. Perry.

THE COURT: All right. We're back on trial. Go

(In open court; jury present)

(Recess)

minutes.

discussions with anybody else about this counterfeit check? Q. What was the discussion you had with Toybe about this

A. Toybe.

THE COURT: OK. We'll take a break now, ladies and

Q. Do you know specifically?
A. No. I don't remember. It was around that area.

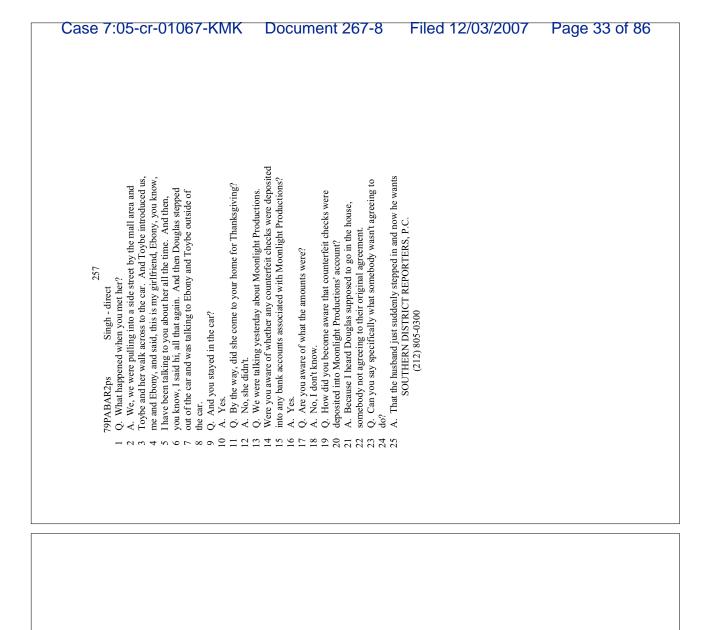
Q. OK.

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Singh - direct

79PABAR2ps

gentlemen, and pick up after the break, all right? Ten



Q. Which conversation was that?
A. Saying when Douglas got off the phone upset saying that she

Singh - direct

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3 agreed to deposit the check and now she's scared.
4 Q. Did you ever meet Ebony?
5 A. Yes. Once.
6 Q. Would you recognize her again if you saw her?
7 A. Yes.
8 Q. Do you see her in the courtroom?
9 A. Yes.

She is on my right in the back with the white shirt.

MS. PERRY: Indicating -- your Honor, will the record

Where is she?

Ö Ä THE COURT: Yes. That is Ebony. Is that correct?

THE WITNESS: Yes, your Honor.

THE COURT: All right.

reflect that she's indicating who she's indicating.

When do you recognize -- I'm sorry. When did you meet

SOUTHERN DISTRICT REPORTERS, P.C. (212) 805-0300

Were you accompanied by anybody else? In Manhattan around the 34th Street mall

And where did you meet her?

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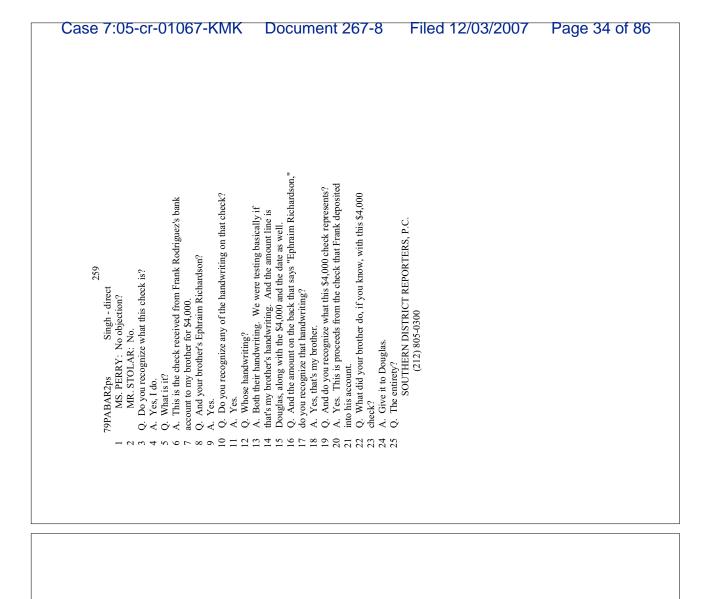
A. In the fall in 2004.

Ebony?

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Q. Were you accompanied by anybody else'A. Yes, myself, Douglas.Q. And was she accompanied by anybody?A. She and Toybe.

She and Toybe.



Q. Did you and Douglas get any proceeds from that counterfeit

A. I was there. There was a discussion with Frank and

Douglas.

Q. I would like to ask you to turn to Government Exhibit 202.

A. Yes, we did.

check?

which is in front of you. Is Government Exhibit 220 --

MS. PERRY: The government offers this exhibit. It's

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

MR. STOLAR: Let me see what it is first.

Q. Are you aware of any specific counterfeit checks that Frank Rodriguez deposited into accounts?

A. He deposited, I think the amount was \$85,000, into his

Wachovia account in Philadelphia.

Q. How do you know that?

Q. What were you aware of specifically?

A. Yes.

A. Yes.

A. No. Q. Yesterday you testified about a friend of Douglas's named Frank Rodriguez?

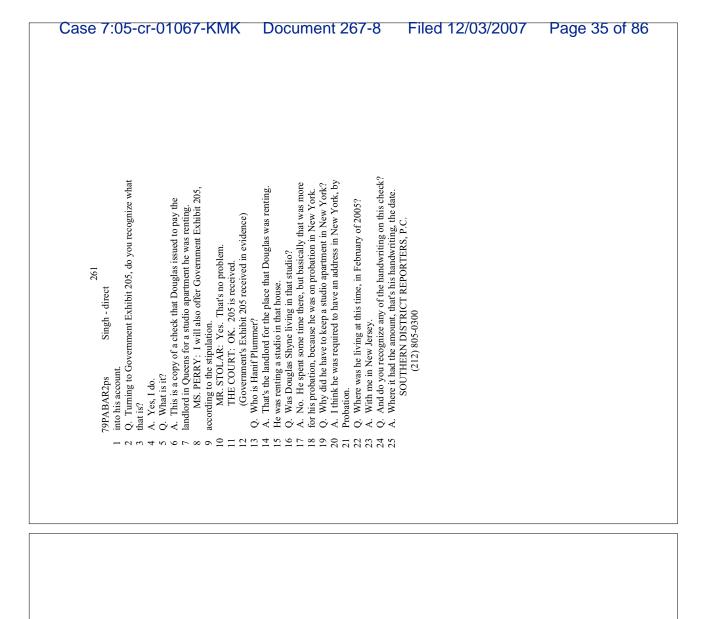
Q. Did you ever see the counterfeit checks that were deposited

in the Moonlight Productions account?

to demand more than what they agreed upon.

Singh - direct

79PABAR2ps



Q. And what do 203 and 204, what do those exhibits represent?

A. Checks from the proceeds of the money that Frank deposited SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

MR. STOLAR: No objection, just to be assured that

These are photocopies of checks?

Ö

A. I'm sorry. Yes, it is.

they are photocopies of checks.

evidence)

(Government's Exhibits 203 and 204 received in

THE COURT: They are received.

MR. STOLAR: No objection. MR. JACOBS: No objection.

and 204 pursuant to a stipulation.

Q. Turning to Government Exhibit 203 and 204, do you recognize

those two exhibits?
A. Yes, I do.
Q. What are they?

A. Yes.

A. For taking the risk of depositing the check.
Q. Was your brother also knowingly involved in other similar transactions where he had proceeds of checks?

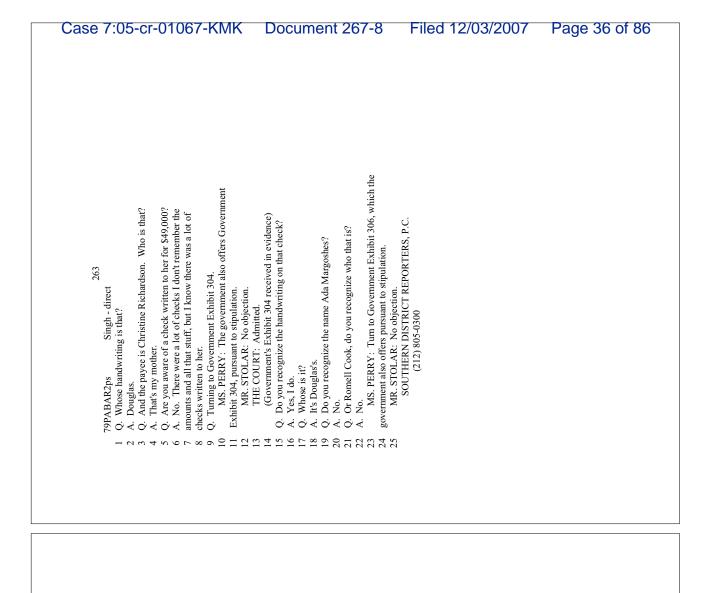
They're two checks issued to my name, from Frank's account.

MS. PERRY: The government also offers Exhibits 203

A. No. He -- less whatever amount he and Douglas agreed upon. Q. What was the purpose for his getting a share of the

Singh - direct

proceeds, your brother getting a share of the proceeds?



Q. Do you recognize any of the handwriting on these checks?

SOUTHERN DISTRICT REPORTERS, P.C.

A. Yes.

(212) 805-0300

(Government's Exhibit 303 received in evidence)

MR. STOLAR: No objection.

stipulation.

THE COURT: OK.

MS. PERRY: The government offers 303 pursuant to

which is in front of you.

A. Yes, a lot.

Q. I'd like to ask you to turn to Government Exhibit 303,

Tracey, Tracey Livingston. Was Frank involved in additional other activity with,

Q. Was Frank involved in addition fraudulent activity with Douglas?

Douglas and Frank remade the check for a larger amount and give

his wife cash in place of the check that they altered.

Q. Who was Frank Rodriguez's wife?

A. Yes. There was a refund check sent to his wife, and

Q. Are you aware of whether Frank or Francisco Rodriguez was involved in any other checks with Douglas Shyne?

Q. Was that studio apartment rented in your name?

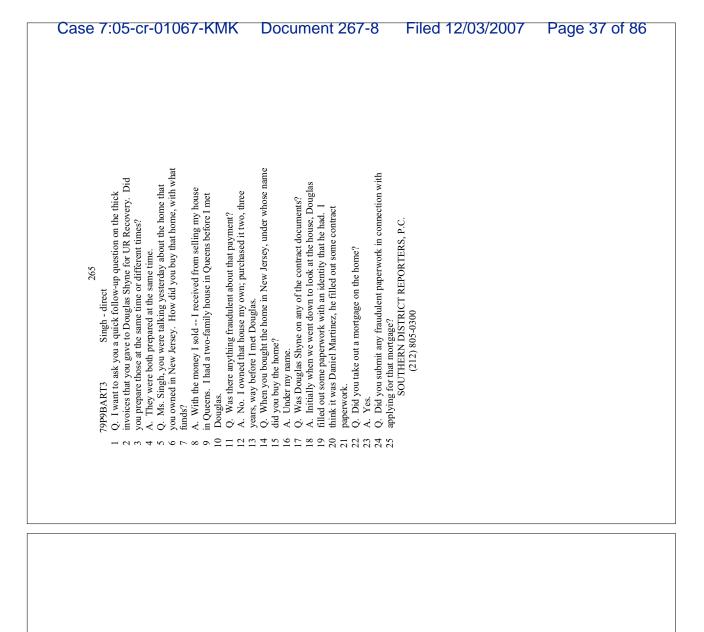
A. Yes.

Q. How about -- OK. And it says on the bottom line "Natasha Singh, rent," several months. Do you recognize that

handwriting?

Singh - direct

79PABAR2ps



there and I see the address all time and Frank and Douglas talk about it because it's the mother's address. They discuss that

A. Because I know Douglas and they receive a lot of mails

That's Frank Rodriguez's mother's address.

Ä

Q. Do you recognize the Street in Philadelphia?A. Yes, I do.Q. What is that address?

Q. How do you recognize that address?

Do you recognize the street address 806 West Somerset

(Government's Exhibit 306 received in evidence)

THE COURT: All right. Admitted.

MS. PERRY: Yes, your Honor.

THE COURT: 306.

79P9BART3

264

Singh - direct

So they wouldn't be traceable back to Frank or Douglas.

Q. If you could turn to page 1256 of that same exhibit.

Do you recognize the handwriting on that slip?

What is that? It's Douglas'.

A. Yes, I do.

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

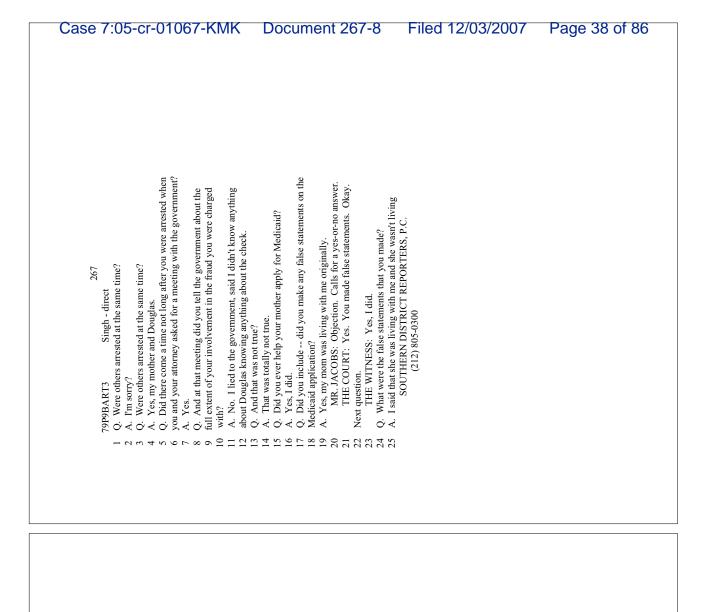
A. I know they order things by phone and all that kind of

fraudulent stuff they receive at that address. Q. Why do they receive it at that address?

Q. Do they discuss a kind of mail they receive at that

in my presence.

address?



A. Yes, I did.
Q. What was that?
A. Tax paperwork, showing my income was more than what it was.

266

Singh - direct

Q. And did you prepare those fraudulent tax returns?
A. No. Douglas prepared because he had some prior tax experience. He used to do taxes.
Q. But did you knowingly submit those to the mortgage company?
A. Yes.

Q. And the two that you stole from your job, did you know what

A. One, I use -- one Douglas opened an account online and I

those identities were used for?

used it, credit card; and another one he -- the second one he opened a bank account to deposit proceeds from fraudulent

You testified yesterday you were arrested in August of

Q. When were you arrested -- withdrawn.

checks.

For the fraud activities with Douglas. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. Yes, I was.Q. What were you arrested for?A. For the fraud activities with I

2005?

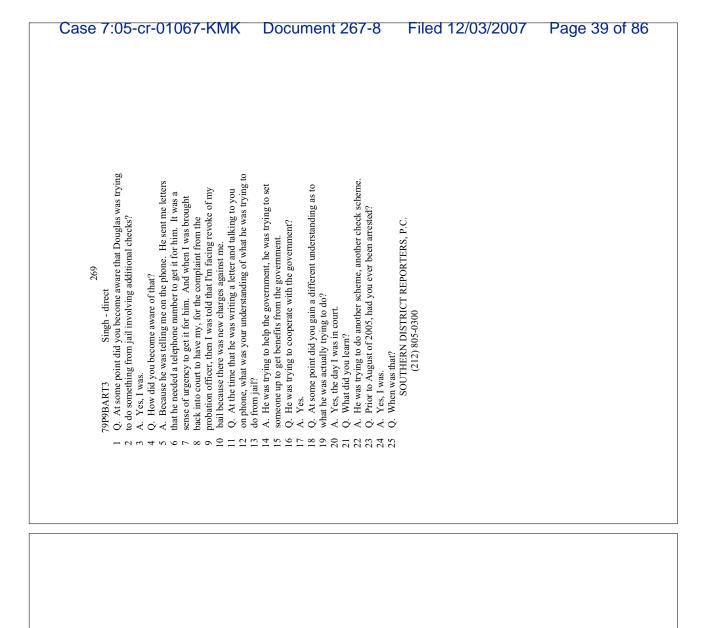
A. Well, two I stole from my previous job at Allstate; and the

rest, I don't know where he got them from. He had several

contacts.

Q. You testified about several identities that Douglas used.

Do you know where he acquired those identities:



went to the pharmacy, thinking that was an emergency, and I got

Q. Was there another time when you knowingly violated the

conditions of your bail?

in trouble for it.

want me to do that. I went ahead and I went and I lied to him.

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. Was Douglas Shyne ever released on bail? A. No. He's still in prison.

No. He's still in prison.

Q. So you lied to the probation officer? A. Yes, I did.

A. Yes, shortly after that I worked. I had cashing my paycheck to buy grocery and pay my car loan, and he did not

supermarket to buy food for my babies and the probation officer

A. The day after I was sent home in a bracelet, I went to the

Q. What did you do?

Yes, I was.

Ą

did not want me to do that, but after being away in prison for

three months I did that, and I told the probation officer I

Q. Were you ever accused of violating the conditions of bail?

your case? A. Yes, I was.

She's very ill.

So she would get Medicaid to keep, for her to stay alive. Q. At some point were you released on bail in this case, in

Q. What was the purpose for making that false statement?

268

Singh - direct

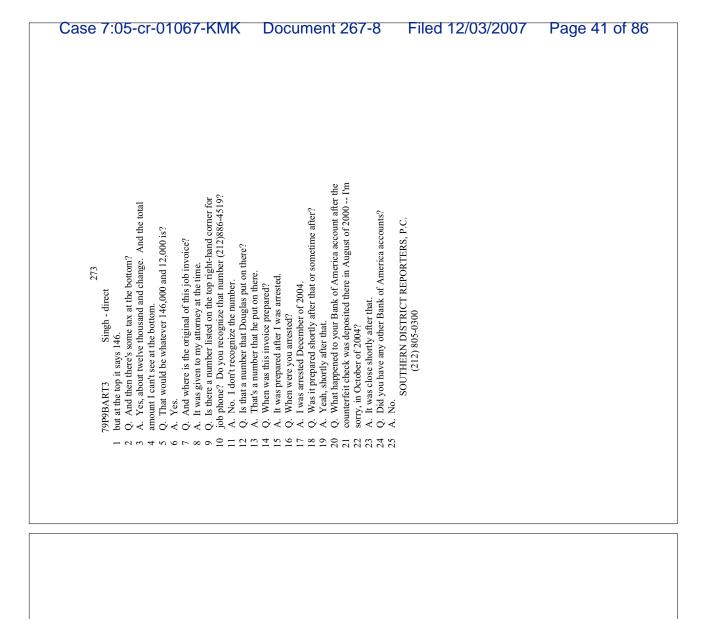
with me at the time.

79P9BART3

Page 40 of 86 Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 A. Yes, it was, a fake invoice was submitted.
Q. Who did you submit that fake invoice to?
A. To my attorney at the time.
Q. And you submitted to your attorney knowing that he would give it to the police or to the court? A. This is a copy of the fake invoice that was submitted to my Q. Whose handwriting appears on Government Exhibit 1311? A. Yes, at the bottom where it says work ordered by, and my Q. I'd like to ask you to turn to Government Exhibit 1311, A. Yes. Q. Based on that fraudulent invoice, the case was actually Does your handwriting appear at all on the document? THE COURT: Mark it in. SOUTHERN DISTRICT REPORTERS, P.C. MS. PERRY: Government offers exhibit 1311. Do you recognize Government Exhibit 1311? MR. STOLAR: No objection. MR. JACOBS: No objection. Singh - direct (212) 805-0300 which is right in front of you. attorney at the time. Q. What is that? A. Yes, I do. Douglas'. dismissed? signature. A. Yes.

(212) 805-0300

1 A. It was December of 2004.
2 Q. What were you arrested for?
3 A. For fraudulent check deposited into my account.
4 Q. Who had deposited that check?
5 A. Douglas.
6 Q. How do you know that?
7 A. Because we discussed it. He told me.
8 Q. Did he tell you at the time he deposited it?
9 A. No. He told me he was going to deposit it. He didn't tell Q. Were there any documents that were submitted in an effort Q. After were you arrested in connection with that counterfeit Q. Did you and he get proceeds from this counterfeit check And into what bank account did he deposit this check? Q. Did he tell you -- when was this that he deposited that Q. And into what bank account did he deposit this chee
 A. Into a business account that had -- that I opened up.
 Q. What bank? SOUTHERN DISTRICT REPORTERS, P.C. check, what happened with your court case? 270 deposited into the business account? Singh - direct A. Around October of 2004. to get the case dismissed? Bank of America. me I'm doing it now. A. It was dismissed. A. Yes. check? Ä



Q. And it adds up to what amount?

A. A hundred and -- I can't see the grand total at the bottom SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

 And it lists a whole number of materials that supposedly A. It's showing that it's coming from us, Douglas and I, the

are sold to Krief Medical?

business, and we sold these items listed to Krief Medical.

So who does this invoice purport to be from?

check was deposited into at Bank of America, was that the

Douglas coffee account? Yes, it was.

Ä ö

Who is this invoice - I'm sorry, the business that the

actually submitted a fake invoice in an effort to get out of

the charges?

A. Yes.

Q. And after it was deposited and you were caught, you

A. Yes.

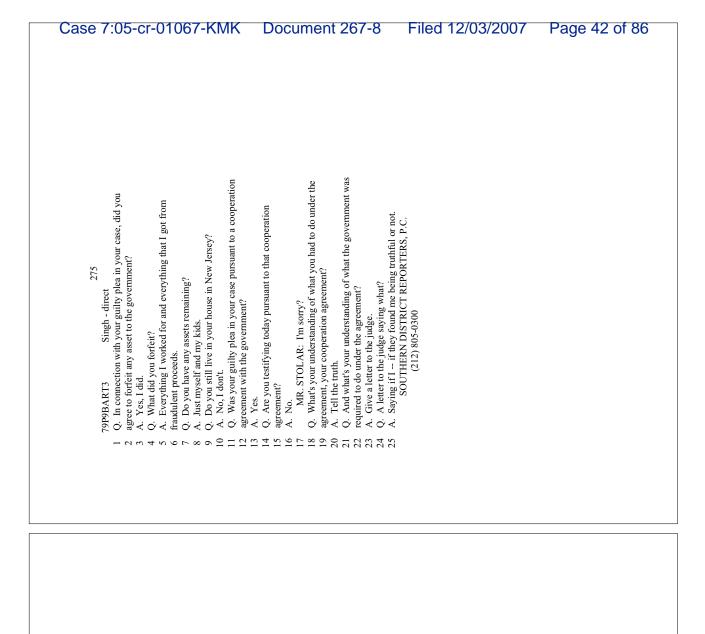
 A. I knew that Douglas was preparing it because when he told me about the check he was depositing into the account, he said,

(Government's Exhibit 1311 received in evidence) Q. Did you and Douglas prepare this invoice together?

79P9BART3

if you ever got caught, you're a victim, meaning that I sold

coffee to Kiref Medical and they give me a bad check.
Q. So that was the excuse that you and he had made up at the time that the check was deposited?



A. To money laundering, bank fraud, immigration. A number of

Q. What did you plead guilty to?

A. Well, when I filed for my citizenship there was a question

charge?

Q. What did you plead guilty with, you said an immigration

charges. I can't remember them all at the moment.

on there that, was I committing any kind of crime, and I said

no. And I was committing crime at the time that that was.

ö

Q. Were you naturalized as an American citizen? Where are you from originally, by the way?

Q. Did you file tax returns for 2004?

A. Yes, I did. A. Yes.

Q. Did you list all the illegal proceeds you had made for that

SOUTHERN DISTRICT REPORTERS, P.C.

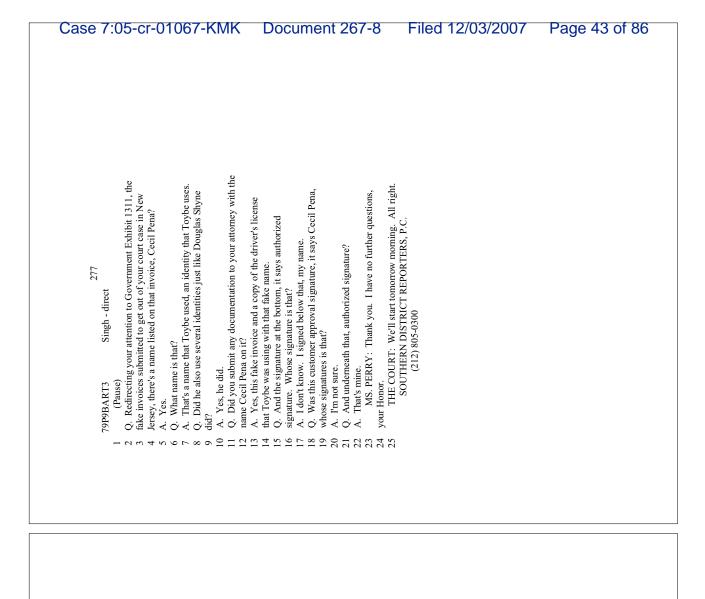
A. No, I did not.

(212) 805-0300

Q. Did Douglas Shyne have any Bank of America accounts?
A. Douglas doesn't have any accounts.
Q. In connection with the case that you were arrested for, did you plead guilty to any charges?
A. Yes.

Q. Did any business associated with you or Douglas Shyne have any other Bank of America accounts?

Singh - direct



Q. And what's your understanding of what would happen if you

Singh - direct

A. The government will then rip the letter up, the agreement Is it your understanding that you are required to tell the

letter.

Q. Is it your understanding, truth in all matters for the government?

MR. JACOBS: Objection, leading.

were not to tell the truth, you were to not tell the truth?

A. Because the government knows that I -- have knowledge of

Why are you testifying today?

Ö

Q. You're not testifying today, it's your understanding,

THE COURT: Sure is.

pursuant to your cooperation agreement?

some information of this case and I have to tell the truth.

Q. Has the government made any promises to you about what sentence you might receive if they choose to write a letter to

your sentencing judge?

MS. PERRY: Your Honor, may I just have one moment?

THE COURT: This judge is not me, right? Who decides what sentence you receive?

The judge.

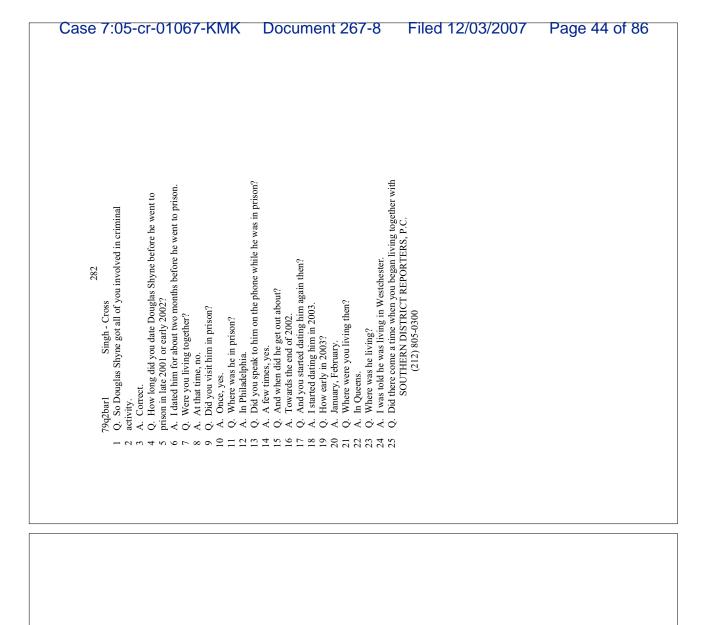
Ö A

THE WITNESS: No, sir.

SOUTHERN DISTRICT REPORTERS, P.C.

THE COURT: Sure.

(212) 805-0300



MR. JACOBS: Your Honor, with your permission, I would THE COURT: Okay, ladies and gentlemen. We are ready

THE COURT: All right, fine.

MR. JACOBS: Thank you. NATASHA SINGH, resumed.

CROSS EXAMINATION

BY MR. JACOBS:

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(Trial resumed; jury present)

79q2bar1

to start cross-examination.

Q. Ms. Singh, I represent Ebony Worthy. My name is Howard

Q. Good morning, Ms. Singh.

A. Good morning, sir.

Jacobs.

Ms. Singh, you testified you met Douglas Shyne in late

brother -- they hadn't committed crimes until they met Douglas

Shyne, had they? A. Correct.

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. How about your family -- your mother, your father, your

A. I have lied, but I have never committed crime.

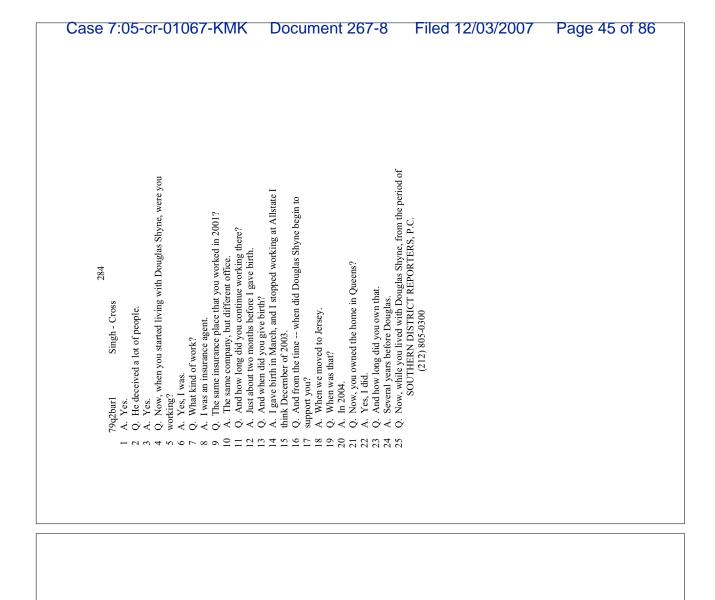
Q. You didn't lie to people?

A. Yes.

Q. Until you met Douglas Shyne, were you an honest person?

A. Summer of 2001.

2001, is that right?



During this period of time when you were with Douglas

March of 2004.

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We were engaged, yes, while I was pregnant.

Did you ever get married?

ĄÖ

No, we did not.

Shyne, did he propose marriage to you?

O. Would you say he deceived you arow.

A. I would say he deceived me about a lot of things.

Q. He was a very good liar, wasn't he?

SOUTHERN DISTRICT REPORTERS, P.C.

0 Q. How many?
1 A. One.
2 Q. And you became pregnant from Douglas Shyne?
3 A. Yes.
4 Q. When was that?
5 A. In 2003.
6 Q. And when did you have your child?

A. Around May, early? I don't remember.
Q. Now, at the time that you started living with Douglas Shyne, you had children at that time?

A. Yes.

A. In 2003, after I became pregnant with our first child.

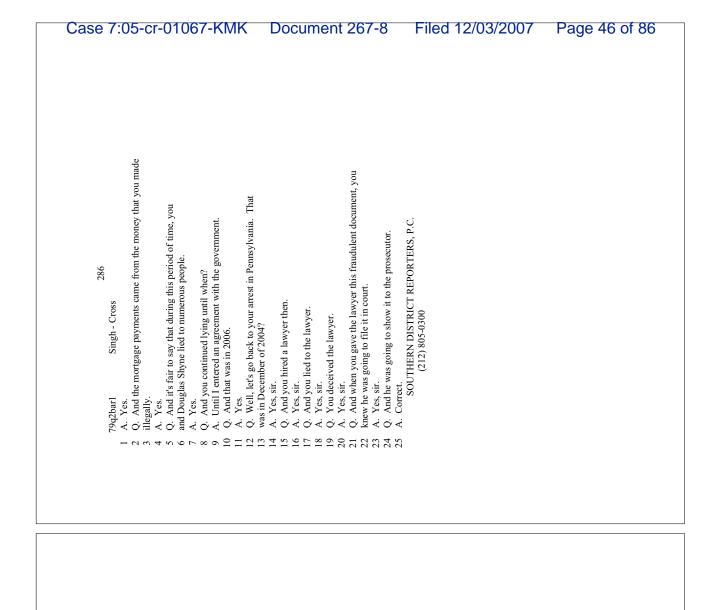
Q. When was that?

Q. Well, what month in 2003?

283

Singh - Cross

79q2bar1 him? A. Yes.



Q. And this home that you bought in New Jersey, how much did

A. It was about \$300,000. Q. Speak up, please.
A. It was about \$300,000.

that cost?

So you had a \$250,000 mortgage?
SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Q. 300,000. How much did you put into it? A. I put \$50,000 down at closing. Q. So you had a \$250,000 mortgage?

2 Q. And you bought jewelry?
3 A. Yes.
4 Q. Clothing.
5 A. Yes.
6 Q. And you took care of your children well that way.
7 A. Yes.

A. Yes. Q. You bought – you and he bought or leased very expensive

Q. And the money was spent in a lavish style.

A. Yes, it was in my name. Everything was all in my name. Q. You had a Maserati and a Ferrari?

A. Yes.

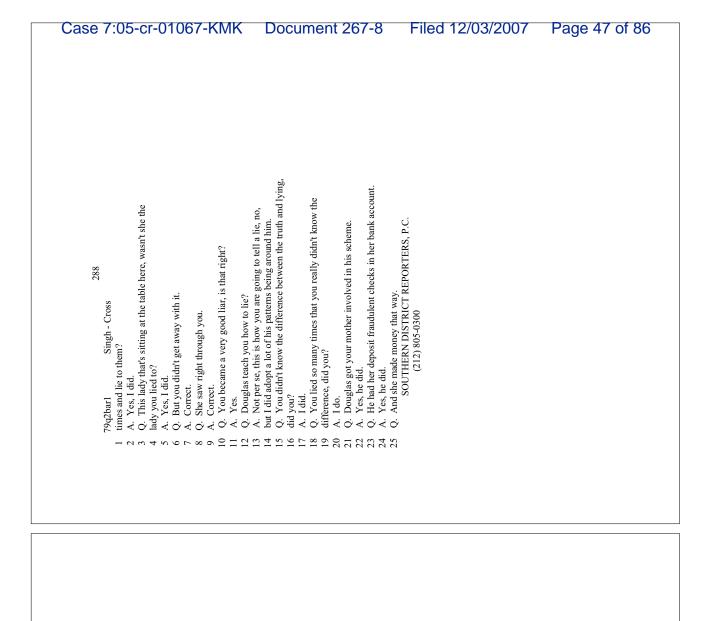
cars.

r &

2003 until you were arrested in I believe August of 2005, is it fair to say that you and he defrauded people out of somewhere

between 3 and \$5 million?

Singh - Cross



Q. And you thought that when you were arrested by the federal

A. Yes, sir.

government, you would do the same thing, is that right?

A. Not more than a night. I think I was arrested — Q. Did you post bail?
A. Yes.
Q. And were the charges dismissed based upon your lies?

Q. How many days were you in jail?

jail.

Q. You lied to the federal government; you would do it again,

and you would get off again, is that right?

A. No.
Q. Well, didn't you go in and talk to the prosecutors several SOUTHERN DISTRICT REPORTERS, P.C.

A. At the time I was just concerned about getting off.
Q. At the time you were what?
A. Concerned about getting off the charges.
Q. When you were arrested in Pennsylvania, did you spend any time in jail?

Q. So you were lying to the court and lying to the prosecutor.

A. Correct.

Singh - Cross

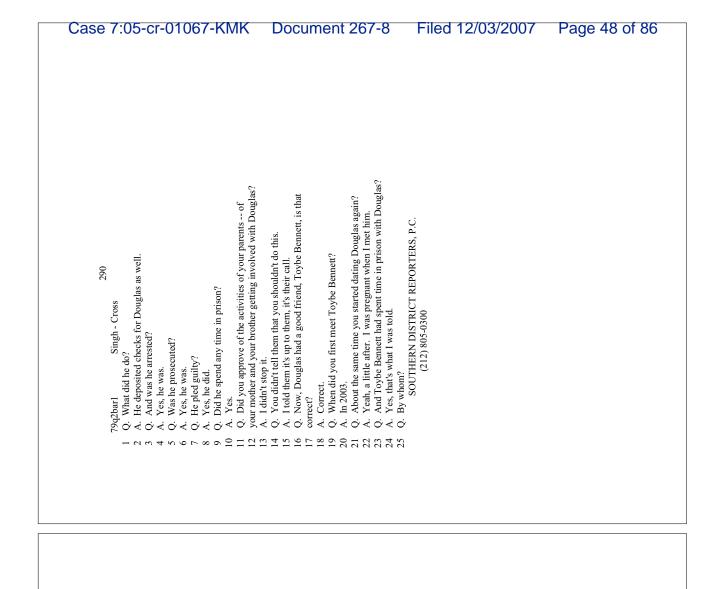
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Q. And you didn't care about that, did you?

Q. When were you arrested?

A. I don't remember the exact date, but I spent a few hours in

A. Just up until the time bail was posted.



SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. No.Q. How about your brother? Did he?A. Yes, he did.

How about your father? Did he get any checks? Did he do any criminal activity with Douglas?

No, he did not.

ò Ä ö

Q. How long ago was she sentenced?
A. About a year ago.
Q. Did she spend any time in prison?
A. Yes, she did.
Q. Is she out of prison now?
A. Yes, she is.

THE COURT: No. I will permit it. Go ahead. Answer.

MS. PERRY: Objection

Do you know what sentence she got? THE WITNESS: No, I don't.

BY MR. JACOBS:

4 Q. And has she pled guilty?
5 A. Yes, she did.
5 Q. Has she been sentenced?
7 A. Yes.
8 Q. Do you know what sentence she got?

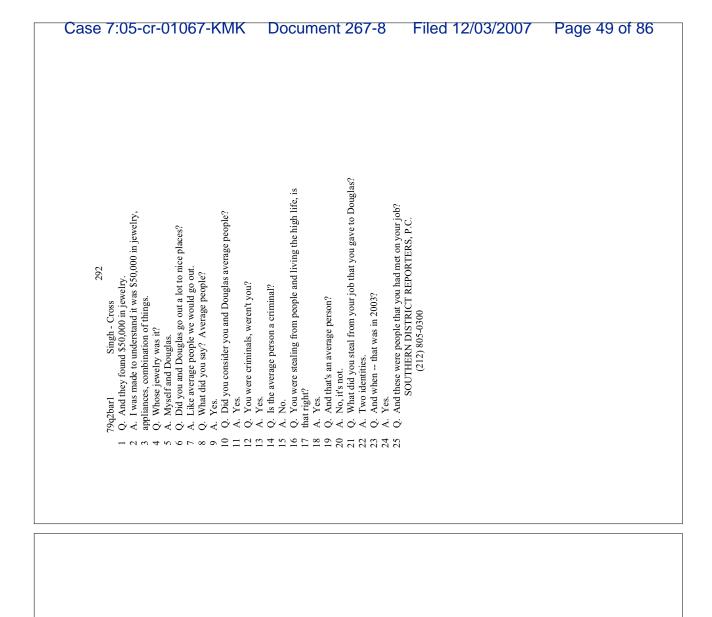
289

Singh - Cross

79q2bar1

A. Yes. Q. And she was arrested.

A. Yes, she was.



Q. And they were very good friends with each other, weren't

Q. Douglas cheated Toybe; Toybe cheated Douglas.

A. Yes.

Q. When you were arrested, did they search your house?

they? A. Yes. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. They found \$37,000 in cash? A. Yes, sir.

Q. This is in August of 2005.

A. I don't know. I just know they had a good relationship.

Q. He lied to Douglas?

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A. Douglas.Q. Was Toybe as good a lawyer as Douglas?A. I would say so.

Q. He lied to many people?

A. Yes.
Q. Did he lie to you?
A. Yes.
Q. And you lied to him?

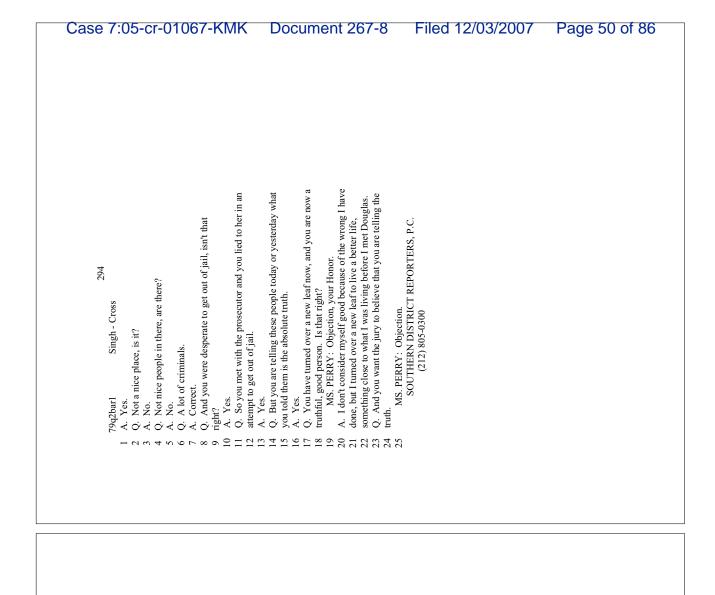
291

Singh - Cross

As far as their lying to each other, I don't know

Q. Did they cheat each other?

Ą.



Who took care of your children while you were in jail?

My 18-year-old brother in Miami.

Ö ₹ Ö

How long were you in jail?

Three months.

And you were desperate, weren't you?

How long did you stay in jail?

Three months. Yes, I was.

A. Correct.
Q. How long
A. Three mo
Q. And you
A. Yes, I wa

Q. Did you care what would happen to your children if you got

Q. And, in fact, in August of 2005, you went to jail, isn't

that right?

A. I didn't think of it that far.

caught?

Q. And you knew that Douglas was going to use these ID's to defraud these people, is that right?

A. Yes. Q. But you didn't care.

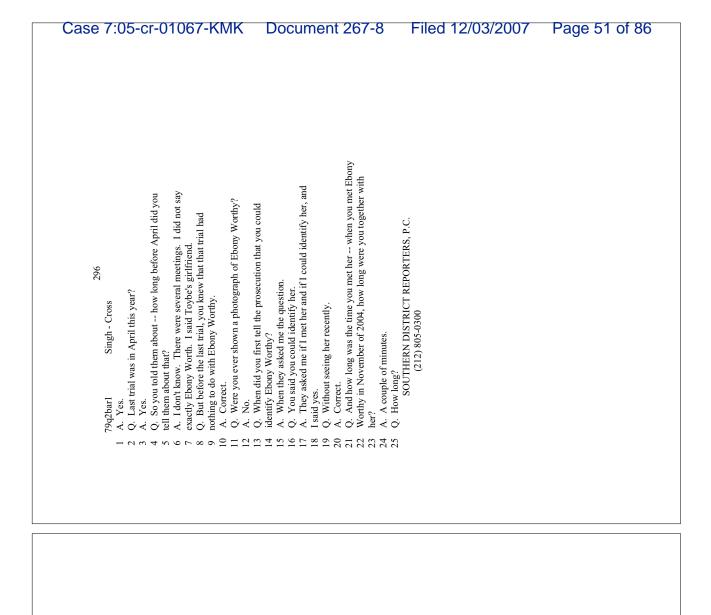
A. Correct.

Q. Did you know these people that you stole their identities?

A. One I met; one I didn't know.

293

Singh - Cross



Q. You told the jury yesterday that you remember Ebony Worthy.

You met her once?

THE COURT: Yeah. Okay. Go ahead

Singh - Cross

79q2bar1

295

your dealings with Douglas and Toybe. You have testified about

that before.

Q. You have testified in court before involving the facts of

A. It will be around November 2004.

better than that?

A. Fall of 2004.

Q. Do you know any time in the fall? Can you fix it any

Q. And when was that?
A. In 2004.
Q. When in 2004?

Q. You didn't testify about Ebony Worthy then because she

wasn't in court, is that correct?

A. Correct.

A. Yes, I did. Q. And there were other people sitting here, is that right? A. Yes. A. While I was visiting the government for our meetings prior

SOUTHERN DISTRICT REPORTERS, P.C.

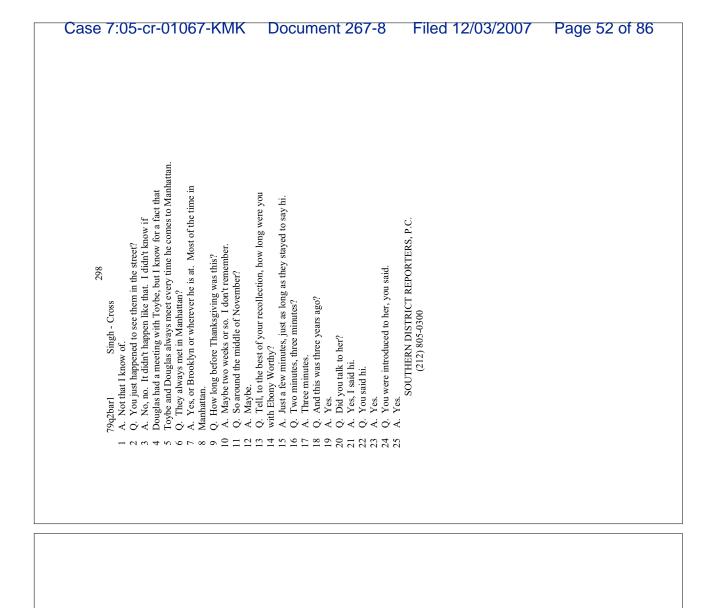
Q. Prior to the last trial.

to the last trial.

(212) 805-0300

Q. When was the first time that you recall telling the

government about Ebony Worthy?



Q. And was there a meeting arranged that you were supposed to

it was coming along with Douglas.

SOUTHERN DISTRICT REPORTERS, P.C.

meet Toybe?

(212) 805-0300

What were you doing over there on 34th Street near the A. I don't remember what the trip was all about, but part of

mall? Ö

Q. 1:00, 2:00, 8 in the morning, what? A. Early afternoon, 2:00.

A. Yes, she was by the car window when I got introduced to

Q. What seat were you in, driver's or passenger's?

Where was she?

ċ

A. Passenger side.

During the day, bright, clear, daytime.

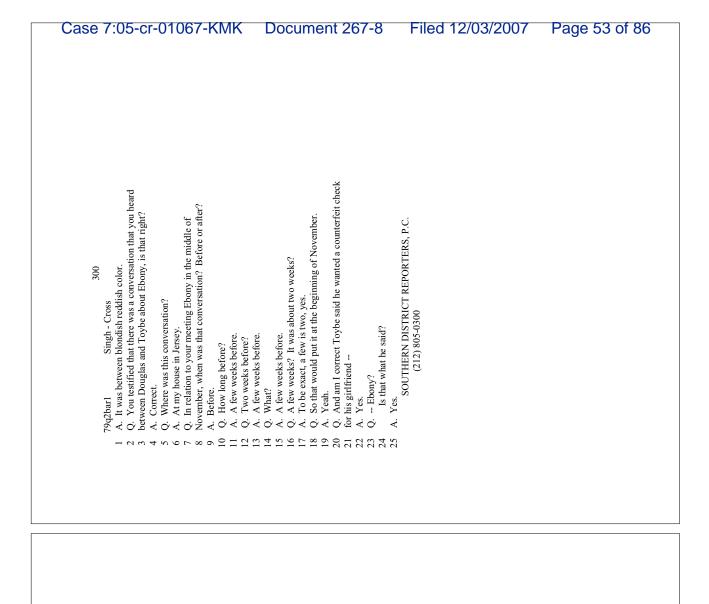
A. She was on the driver's side.
0 Q. She was on the driver's side.
1 A. Yes.
2 Q. And what time of day was this?
3 A. During the day, bright, clear, daytine.
4 Q. What'
5 A. Clear, daytime.
6 Q. Daytime.
7 A. Yeah.

You were seated in a car, and she was on the street

297

Singh - Cross

A. A few minutes. Q. A few minutes.



Q. When you saw Ms. Worthy back three years ago, did she look

finish her answers before a new question is asked?

THE COURT: He did. Okay. Go ahead.

O. What color was it then?
SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. She what? A. She looks a little different. Her hair is colored

A. She looks a little different.

the same as she looks now?

Q. What do you mean by "girlfriends"?
A. Girls he goes out with, girls he talks to. There was two serious ones. Those are the ones I was introduced to.

MS. PERRY: Can the witness just be permitted to

Q. Didn't you say, testify that he had a lot of girlfriends? A. Yes, he had a lot of girlfriends, but not -- two of them were actually his girlfriends that he introduced me to.

A. This is my girlfriend. This is Ebony, who I talk to you

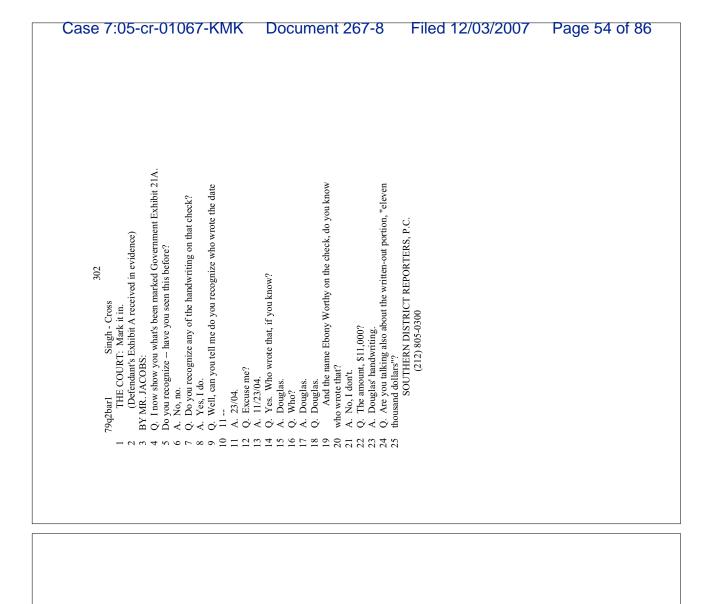
299

Singh - Cross

Q. What did Toybe say?

about all the time.

Q. Did you meet a lot of Toybe's girlfriends?
A. Since I met him, I met all of his girlfriends.
Q. How many girlfriends of his did you meet?
A. Two.
Q. Ebony and one other?
A. Yes.



A. From times picking up Toybe from her house, meeting Toybe in Manhattan. Toybe and her spent a lot of time together.

Q. Ms. Shyne, I show you what's been marked as Defense Exhibit

When did he meet her? Do you know?

A. No, he met her before. Q. Oh, he met her before.

MR. JACOBS: May I approach, your Honor?

Do you recognize who this is?

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MR. JACOBS: I offer it in evidence, your Honor.

Who is that? This is Toybe there. MS. PERRY: No objection. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

He didn't want to give it to Toybe's girlfriend because he

person, it's about Toybe's girlfriend.

liked to give it to -- he didn't want to have any sort of relationship with this woman who he had never met.

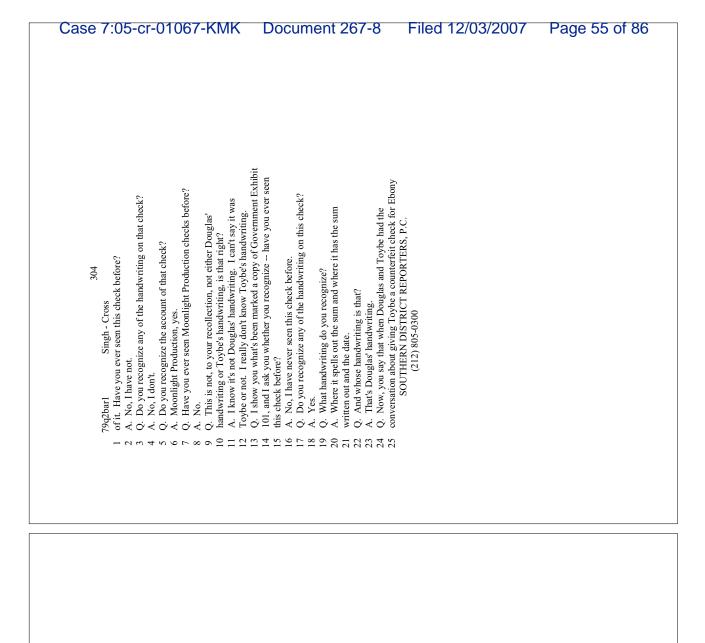
Q. He didn't want to give a counterfeit check?
A. No, it's not about a counterfeit check, it is about the

A. Correct.

Q. And you testified that there was an argument at that point.

301

Q. Douglas didn't want to give a check to Toybe to give to Ebony, is that correct?



Q. Have you ever seen any other checks drawn on this account?
A. No.
Q. I show you what's been marked Government Exhibit 63, a copy SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. Iknow, yes, UR Recovery.

Q. And you see Bank of America, and the address in Richmond,

Virginia? Ą

Q. And you don't know that this is not a counterfeit check? A. No, sir, because the checks, they look like real when

Douglas have the checks made.

Well, look at the account. Do you see the account, Luvenia

A. I don't know. Q. If you know.

MS. PERRY: Objection.

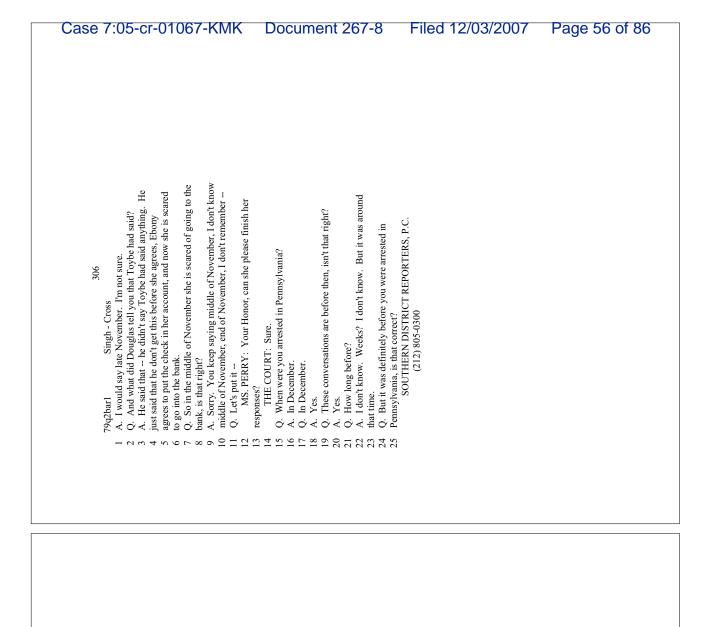
Q. Well, look at the account. Logical Bartee, UR Recovery, do you know that account?

4 Q. And the signature, whose handwriting is that?
5 A. I don't know.
6 Q. You don't know.
7 A. (Shaking head).
8 Q. You have never seen this check before.
9 A. No.
10 Q. Is this a counterfeit check?

303

Singh - Cross

A. Correct. Q. That's also Douglas?



Toybe -- where Douglas is at your house talking on the phone to

Q. Maybe he was lying to Douglas, is that right?
A. I don't know, sir.
Q. Now, you testified about a later conversation where

Toybe and then he gets off the phone and talks to you, is that

The first conversation was end of October/early November.

So we are now in the middle of November? SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. Well, you told us the first conversation was when?

A. Correct. Q. When was that conversation?

right?

A. I would say late November.

Q. Well, what if I told you that the Ebony Worthy account was

A. Yes. I'm not sure exactly, the late part of October/early

November.

Q. And this is all around the 1st of November?

A. Correct.

A. Okay. But Toybe said that there was already an account

opened up on November 19?

with money in it. That's what he said.

Worthy, Toybe calms Douglas down by saying: She is not going

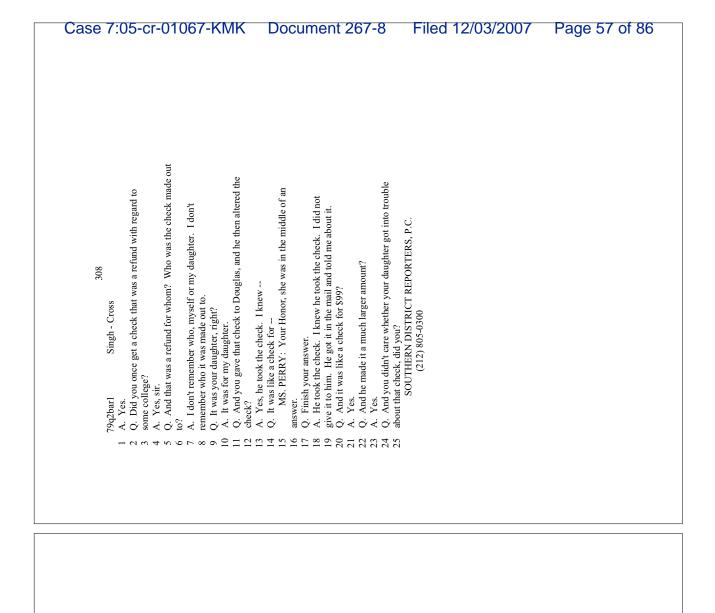
to say anything, is that right?

A. Correct.

Singh - Cross

305

Q. And Toybe said she didn't have the account long, and there is not much in there, is that right?



Q. They were very good at convincing people to do things,

A. Yes. A. Yes. Ö

Did you consider Douglas a con man? Q. How about Toybe? Also a con man?

Do you know what a con man is? Yes.

Q. Can you repeat that, please?
A. Until bail was posted, yes.
Q. And then where did you go?
A. Home.
Q. Back to New Jersey.
A. Yes.
Q. Do you know what a con man is A. Yes.

A. Yes.
Q. They deceived many people.
SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

MS. PERRY: Same objection. THE COURT: Yes, same ruling. He asked. She said it

Q. Was it before you were arrested in Pennsylvania?

question.

THE COURT: Okay. It has been. Go ahead. Next

MS. PERRY: Objection: Asked and answered

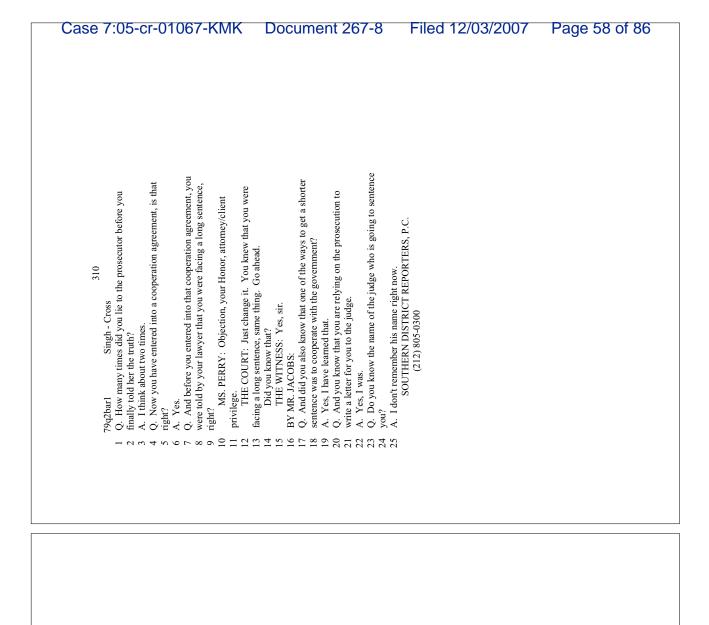
79q2bar1

Q. Did you remain in Pennsylvania after you were arrested?
 A. Well, until bail was posted, yes.

Well, until bail was posted, yes.

was before then. Go ahead. Next question.

r &



But you didn't tell them right away. You waited some time

check, something about a check out there.

Did you tell the government about what he was doing? O. Did you tell the government about what he was doing?
A. I told the government what I knew at the time about a A. Yeah, because I didn't know what was going on. I didn't

before you told them, right?

Ö

have enough information.

SOUTHERN DISTRICT REPORTERS, P.C.

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Q. And at first you thought he wasn't committing a fraud, but

A. Yes.

he was cooperating with the government But then you learned it was a fraud.

And he asked to you help him?

Correct. A. Correct.

Ö

Correct. And did you help him?

40404

No, I didn't.

Q. While you were out on bail in this case, you were still in touch with Douglas on the telephone?

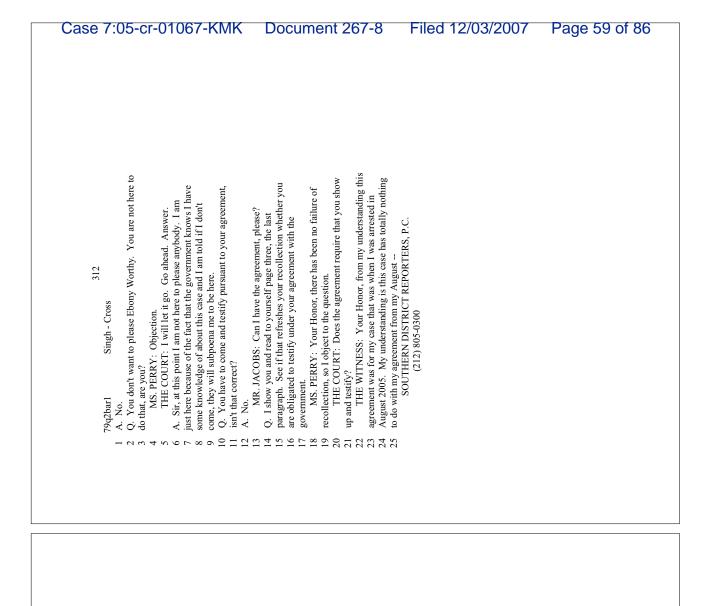
A. Of course not. I cared if she got into trouble. Q. How old was your daughter then?

Singh - Cross

A. She was eight or nine years old.

A. Yes, for a period of time.
Q. And, in fact, you learned that he was committing a new fraud.

9 8 7 8 9



Q. And that's because you didn't have money to hire a lawyer.
A. Correct.
Q. Now, you told us yesterday that you must tell the truth, is that right?

A. What agreement, sir?

Q. And the determination as to who decides whether you are

Otherwise you violated the agreement.

A. Correct.

ĠŸ.

telling the truth are the prosecutors sitting at that table,

isn't that correct?

A. Yeah.

So you want to please the prosecutors, isn't that correct?

THE COURT: I will allow it. Go ahead.

MS. PERRY: Objection.

You don't want to please the prosecutors? SOUTHERN DISTRICT REPORTERS, P.C.

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(212) 805-0300

A. Correct.

Q. The attorney who has been representing you in this case, is

he retained or assigned by the court?

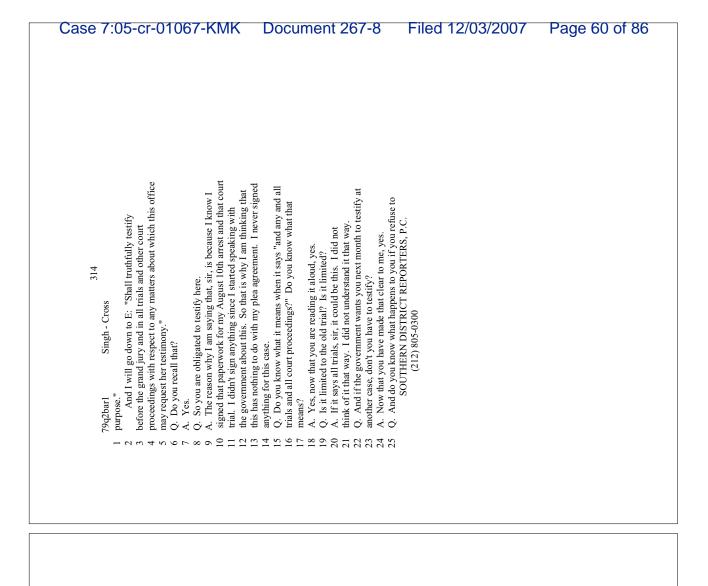
A. Assigned by the court.

Q. And if you don't get that letter, you are going to face a much longer sentence.

Q. Is it Judge Buchwald?
A. Kenneth Karas, I believe. I'm not pronouncing his last

name correctly.

311



understood that Natasha Singh shall truthfully and completely

MR. JACOBS: Page three, last paragraph: "It is disclose all information with respect to the activities of

THE COURT: Sure. Go ahead.

your Honor?

MR. JACOBS: May I read a short portion to the jury,

(Government's Exhibit 1314 received in evidence)

being marked by.

office inquires of her, which information can be used for any SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

herself and others concerning all matters about which this

MR. STOLAR: Do you want to mark it as Defendant' B? MR. LEVY: We have already marked it as Government

MR. STOLAR: It is being offered by the defense.

Exhibit 1314.

THE COURT: I don't care. I don't care who it is

THE COURT: Hearing no objection, it is in evidence

A. Not to my understanding. I did not understand it like

MR. JACOBS: Is this in evidence? I offer the

agreement into evidence your Honor. MS. PERRY: No objection.

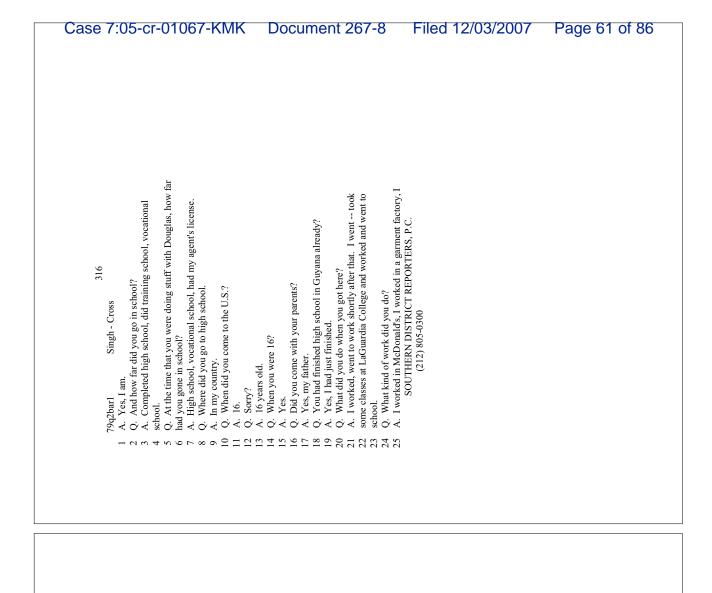
Q. If you refuse to testify at this trial, wouldn't you be

THE COURT: Go ahead.

BY MR. JACOBS:

313

violating your agreement with the government?



Good morning, sir. My name is Martin Stolar. The woman who is sitting right

A. Good morning, sir.Q. My name is Martin Stolar. The w in front of me, do you recognize her?

Good morning, Ms. Singh.

CROSS EXAMINATION THE COURT: No.

BY MR. STOLAR:

Never seen her before in your life?

No, sir.

Ä

Q. Never seen her before in your lifeA. No, sir.Q. I represent her. I am her lawyer.

Q. You figured that out because I was sitting next to her. A. Yes. Q. You are 32 years old?

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. Under that agreement, they will rip the agreement up. Q. They would tear it up.
A. Yes.
MR. JACOBS: No further questions.
MR. STOLAR: I will go, unless you want to break now,

Q. Tell me what happens to you if you refuse to testify at

this trial?

A. Now that you made that clear to me, yes.

testify?

315

Singh - Cross

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 62 of 86 Q. And how did he identify himself? What name did he use?A. Douglas. A. About a month after.

Q. Now, at the time you started going out with him, did you Q. In 2001. Do you remember the month, roughly?
A. End of July/August.
Q. And he wanted insurance for a car that was registered to New York Five Star Coffee? A. I was the selling agent at the time, at the time he came into the office. How long after he first came in did you start going out Q. When did you first find out he had been to jail?
A. After he went to jail 2001.
SOUTHERN DISTRICT REPORTERS, P.C. A. Not at the time, no, I didn't -- he didn't say that. 318 Q. Were you his broker, assigned to him? Singh - Cross (212) 805-0300 Did he have a nickname? know that he was an ex con? Douglas Shyne? Q. Sorry? with him? Q. Doug A. Yes. Q. Did h A. 2001. A. Yes. Ö

Q. You met Doug Shyne when he was a customer of Allstate, is

that right?

MS. PERRY: Your Honor, this is not relevant.

Somewhat? Somewhat.

Ö Ä

A. Yes.
Q. Do you remember when it was?
SOUTHERN DISTRICT REPORTERS, P.C.

is three, and I have an 11-year-old from my previous marriage.

Q. Have you ever been in the military?

A. No, sir.

Q. Are you a religious person?

A. Somewhat.

Q. How many children do you have now?
A. I have three kids now.
Q. And what are their ages now?
A. I have my baby boy is a year and a half, my daughter, she

way up from being a secretary to being a licensed broker?

A. Yes, because at the time they were sending you to school, giving you the opportunity if you wanted to become an agent.

Q. You have worked there for nine years. And you worked your

A. Around 17, 18. I have worked there for nine years.

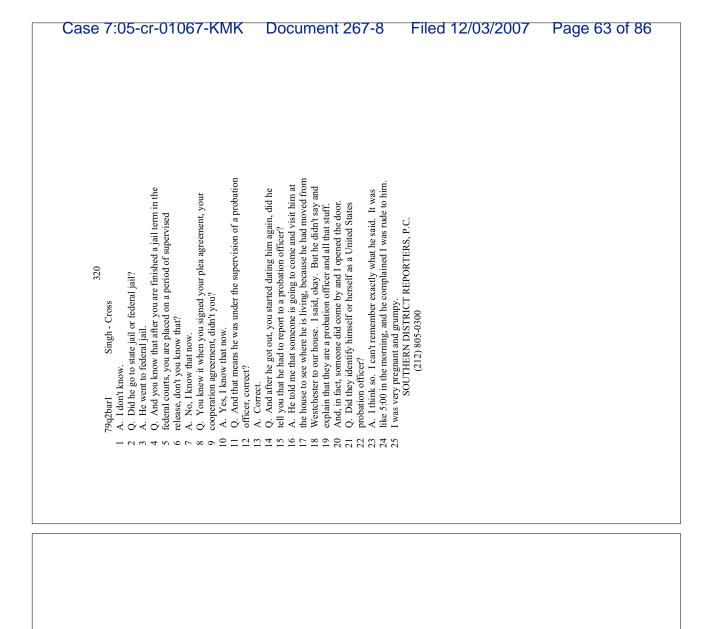
Q. When did you start at Allstate?

worked in a supermarket, and then I went to work as a secretary

Singh - Cross

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at Allstate and I have been working there since. I got my



innocent all along until he came out. We started back dating, and as we were dating, and began more serious, I fell in love

with him, and that's when a lot of stuff started coming out

that wasn't adding up.

Q. After he got out of jail, he was on supervised release? SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. Well, it did bother me, and then he claimed that he was

Q. Did that bother you, that the person that you had been

dating went to jail?

A. I think it was bank fraud, check fraud.

How did you know he was doing it then if you didn't know

Q. Did you know about it? A. No.

A. Yes.

A. Because after the fact, now I know all the things he was

about it?

doing.

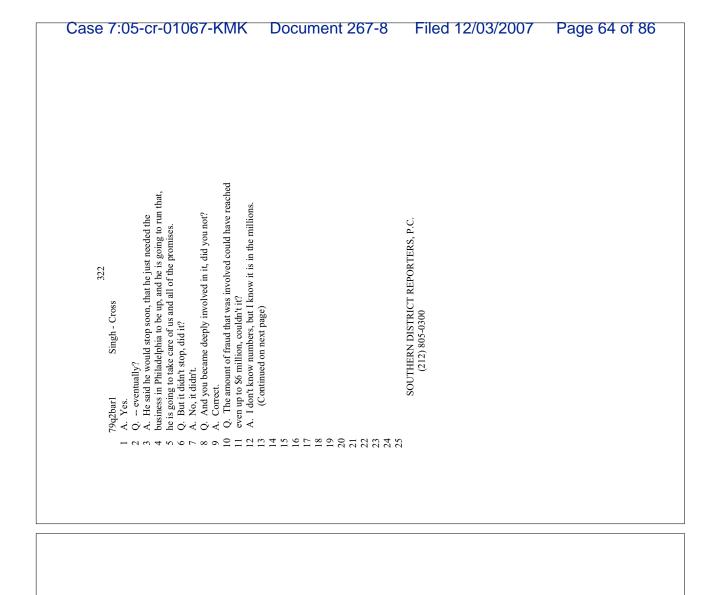
Q. When he went to jail in -- after you started dating him,

what did he go to jail for? A. Something fraudulent. Q. Bank fraud, tax fraud?

Q. So in the first few months that you were dating him, you

didn't know that he had been in jail already?

Q. And you didn't -- was he doing illegal things, fraudulent things during the time you were dating him?



things to me what he wanted me to know, and he said, Of course,

-- and we talked about it, and he came in front, he said

A. I was pregnant already with him -- Q. Well --

should not be involved with that?

that stuff, everything that a woman would want to hear to make

her feel better.

Q. And by then you were pregnant?
A. Yes.
Q. And he said it was going to stop -SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

he promised that, you know, it's going to stop and this and all

Q. How did they come out?

A. Through conversation, things he would say, what he is doing in the course of a day.

Q. After Douglas got out of jail, when did you learn that he

Singh - Cross

321

A. Shortly after we started dating again, bits and pieces

started coming out.

was involved in illegal activities?

A. Conversation with other people. I can't remember exactly,

Q. What types of things would he say?

9 ~ 8

So it became apparent to you that he was involved in

illegal activities?

Q ije Q

Correct.

but just things that it didn't sound right to me.

Q. Didn't you, with your background, decide that maybe you

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 65 of 86 Do you know what his percentage was? What was his fee? A. Douglas. He worked with Douglas late nights in the cafe. Q. Do you know how much money went through Ephraim's account's? A. I don't know what anybody's fee is. That's something Douglas decides. He doesn't discuss it with me. SOUTHERN DISTRICT REPORTERS, P.C. Q. Into his account or was he involved in recruiting other How much money went through Ephraim's accounts? A. I don't know how much, if that's what you're saying. Q. How about a fellow named Ephraim Richardson?
A. That's my brother.
Q. You got him involved? A. I don't know if he was involved recruiting. people to deposit checks into their accounts? 324 Deposit checks in his account as well. Did he recruit people? Singh - cross Deposit checks in his account. (212) 805-0300 A. No. Q. Who got him involved? What did Ephraim do? Not that I know of. A. I'm sorry. Pardon? Huh? Q 4 Q 4 Ö ₹ Ö ÖĞ

By depositing checks into his account. SOUTHERN DISTRICT REPORTERS, P.C.

How was he involved?

Ą Ö Ą

In Brooklyn, Flatbush.

Where did he live?

Toybe's cousin.

(212) 805-0300

Who is Roberto Montgomery?

Roberto Montgomery?

Ö ď $\dot{\circ}$ Ä Ö

Yes.

Q. So far, you've told us that you were involved, that Douglas

Singh - cross

7909BART2

Did Bennett have a nickname, by the way? was involved, that Toybe Bennett was involved.

A. Just Toybe.

You were involved in the fraud during the period of time

that we're talking about?

A. Yes. Ö

And there are more people involved, however, right?

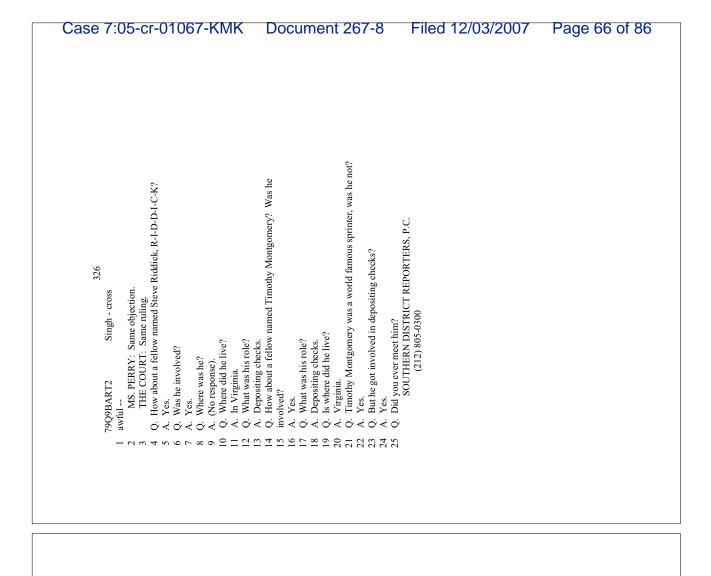
Nathaniel Shyne? Douglas' brother?

Ä

Yes. Yes.

0 4 0 4

Q. Just Toybe?
A. Oh, Panama. I'm sorry.
Q. Panama. At least the three of you are involved, right?
A. I'm sorry. What did you say?
Q. You were involved in the fraud during the period of tim



MS. PERRY: Objection, your Honor. That was not the

Q. If we're up to five million dollars, that would be an SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

THE COURT: Yeah. Next question.

close, wouldn't it? MS. PERRY: witness' testimony.

Q. Well if we're getting up to six million dollars it would be

A. I don't know where he is now, but I knew he lived in Staten

Where was Jason?

Ö

O. How about a fellow name Naresh Pitambar?
A. Yes.
3 Q. He was involved?
A. Yes.
5 Q. Where was he living?
6 A. He was living in Queens, Richmondville, I think.
7 Q. What was his role?
8 A. Depositing checks in his account as well.
9 Q. How about a fellow named Jason Watler?
10 A. Yes, he was involved.

Singh - cross

79Q9BART2

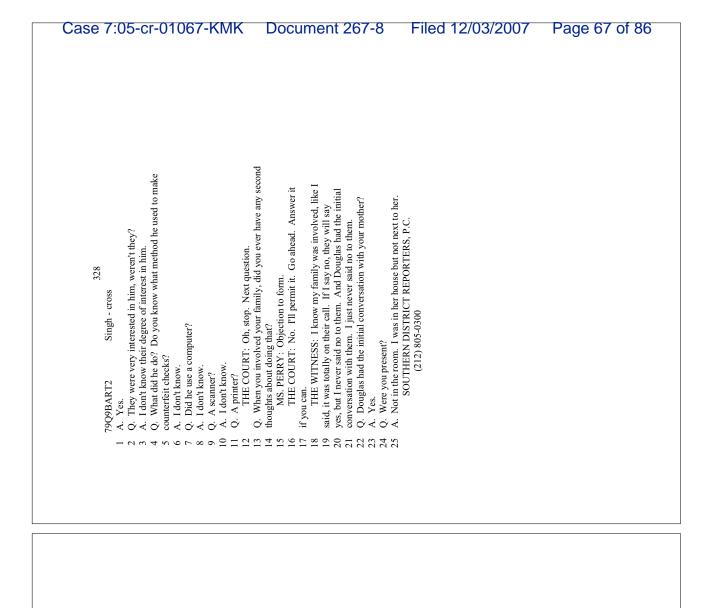
Do you know how many checks these fellows deposited?

Depositing checks. He was Toybe's cousin.

Q. What was his role?A. Depositing checks. F.Q. Do you know ma

Island, I believe.

A. A lot. Q. Thousands? A. I wouldn't say that.



Have you ever been shown pictures of him by the government?

Did they ask you about him? SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. I don't know. I don't think I'm good at guessing people's

Age?

ò

age. Black guy. That's it. Dark skin.

Q. How about a woman named Ayana Thomas? Did you know her? A. No.

A. No.

Q. When checks were counterfeited, who is the person that did

A. Douglas' friend in Philadelphia named E.

E like the letter E?

the counterfeiting of the check?

Yes. Did you ever meet that person?

Could you describe him? Tall, dark skin, bald head.

A. No. O. How about Raymond Pastures, a fellow known as Moon? Did you know him?

A. Through the charges and coming to court for trial.
 Q. Nathaniel Alexander. Did you know that person?

A. No. Q. How did you know his name?

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Singh - cross

79Q9BART2

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 68 of 86 Q. That would be detective Gregory Young? A. Yes. Q. And then you went and you got an attorney named F. Emmett the cafe and I spoke to him on the phone, my cell phone, and he wasn't there, and I spoke to him on the phone. He called from said he was there, he has a warrant for my arrest. And that A. He called at the cafe for me, and then he went by and I Had you did you find Mr. Fitzpatrick, if it's a Mister? SOUTHERN DISTRICT REPORTERS, P.C. 2 A. Yes.
3 Q. And you deposited that check in Philadelphia?
4 A. No. It was in New York.
5 Q. When did you get arrested? Do you remember?
6 A. In December.
7 Q. How did you get arrested?
8 A. Myself and attorney went in to see the detective.
9 Q. How did you know to go see the detective. Myself and attorney went in to see the detective. When did you get arrested? Do you remember? Did you pay Mr. Fitzpatrick to represent you? afternoon me and an attorney went in to see him. 330 Q. That was the Philadelphia operation? Singh - cross (212) 805-0300 Fitzpatrick; is that right? From Douglas? From Douglas. 7909BART2 A. Yes.

Q. Maybe that's why he knew a lot about how to figure out the tax return?

The invoice that was prepared for your Pennsylvania arrest

Ö

A. Yes. Q. And you went right along with that, didn't you? A. Yes.

dealt with a counterfeit check that you tried to deposit in the

amount of \$150,000, didn't it?

What account was that deposited to? A. Yes. That was deposited, the check. Business account in my name.

Ö

New York Five Star Coffee. SOUTHERN DISTRICT REPORTERS, P.C. (212) 805-0300

O. Now, the illegal conduct that you were involved in was not limited to forged checks and counterfeit checks, was it?

A. No, it was not.

O. It also involved fraud on the mortgage company?

A. Yes, by submitting a false tax return.

Q. What did he tell her? What did he tell anybody who he A. I don't know. I was never there to really listen to what

he's saying to recruit somebody.

recruited? What was his line?

Q. Did you know whether or not Douglas himself had been --

previously done -- been jailed for tax fraud?

A. Yes.

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 69 of 86 Q. And when it came to the banks, who would suffer the loss? A. I'm not sure who suffers the loss, but Douglas told me that A. Correct, I didn't.
Q. Why not?
A. Because, again, Douglas said that these checks he has in Q. You realize that with all these checks and all these credit Isn't the FDIC actually, who eventually took the hit for a Q. How about the Federal Deposit Insurance Corporation?
A. Yes, I understand.
Q. They would cover the losses, right?
A. Yes. cards that you were using when you still had these, that you Do you know who funds the Federal Deposit Insurance the works and that's it, that's it. We had a lot of problems SOUTHERN DISTRICT REPORTERS, P.C. the bank suffers the loss and they get a tax writeoff. O. Isn't the FDIC actuatry, lot of these checks, funded by us taxpayers? MS. PERRY: Objection. 332 and we were having a lot of problems. were stealing from people, right? A. I don't know what amount. (212) 805-0300 Q. Up to a certain amount? The customer? Corporation? A. I'm sorry? 7909BART2

arrested in the Pennsylvania case in December that maybe you

should stop doing this business?

But you didn't, did you? SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. Now, did it occur to you, after this -- after you got

Q. And you perpetrated a fraud on the Pennsylvania courts?

A. Correct.

correct?

Correct.

A. Correct.
Q. You perpetrated a fraud on the Pennsylvania police,

phone number, the name of the company that was on the check,

Q. And he wrote a letter -- actually, after he got the invoice he had his investigator go to work to try to track down the

Q. And were you aware then, that shortly after you retained

Singh - cross

7909BART2

him, you gave him that phony invoice, correct?

A. Correct.

investigator going do work, the phony invoice, and the Cecil

A. Correct.

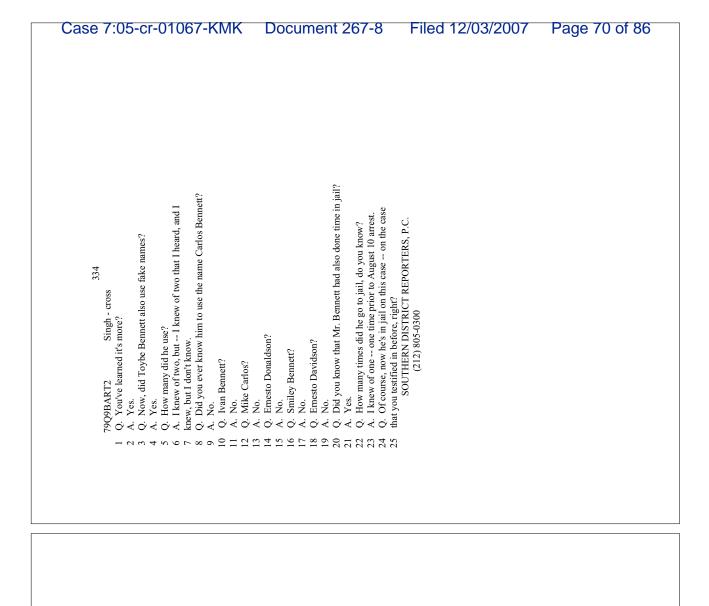
right?

Pena license, right, he wrote a letter to Detective Young So, he had his investigator go to work. Based on his

asking him to please drop the case, correct? And the case was dropped, right?

A. Correct.

Ö



Q. How many times did Douglas tell you he had been convicted

of crimes?

Ever use the name Douglas Shyer?

Ever use the name Trevor King?

Ö ₹ Ö

A. I think twice, but I've learned it's different. SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. Yes.
Q. How many different names did he use, to your knowledge?
A. Several.
Q. Did he ever use the name Douglas Bey, B-E-Y?
Q. Ever use the name Douglas Santiago?
A. He mentioned something about Santiago to me.

Q. Ms. Singh, you indicated that Douglas, as you called him,

THE COURT: All right, counsel.

(Jury excused)
(Recess)
(Jury present)
THE COURT: 7

had used different names at different times; is that right?

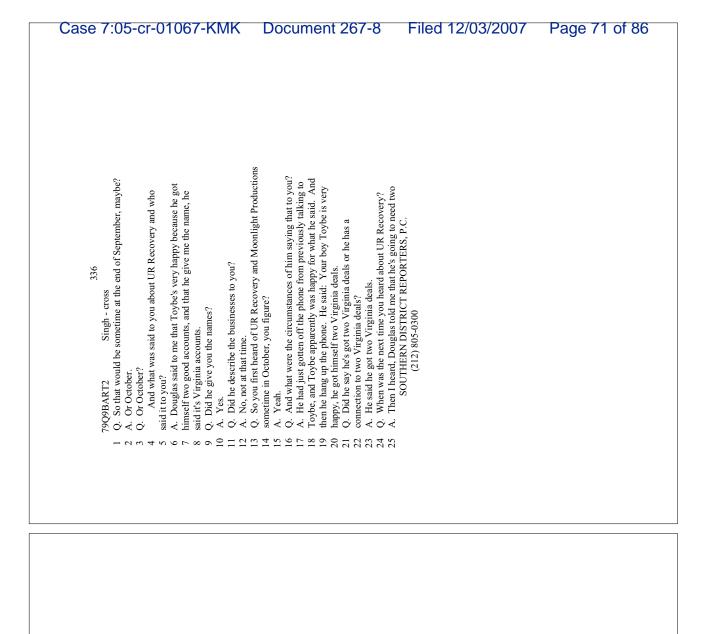
MR. STOLAR: Judge, could we take a morning break? THE COURT: Sure. Take ten, Ladies and Gentlemen.

THE COURT: If you know. Do you know?

THE WITNESS: Yes.

Singh - cross

79Q9BART2



A. He owed him, to give him money, do him a favor, something

along that line.

Q. Well, in this conversation that you testified Roberto said

to Toybe: All these things you had me doing for you, you really owe me, what did you understand that to mean?

Q. In that initial conversation was the name UR Recovery

mentioned?

A. No.

Late August, September, around that time.

Ä

Q. And that was in August of 2004?

A. Yes.

first heard about UR Recovery from overhearing conversation

with Mr. Bennett and Roberto Montgomery?

Q. When they were helping you move, right?

Q. I believe you testified on direct examination that you

335

Singh - cross

7909BART2

Q. And you say Toybe said: Don't worry I got you -- I got you; my deal is to come through soon and I'll take care of you?

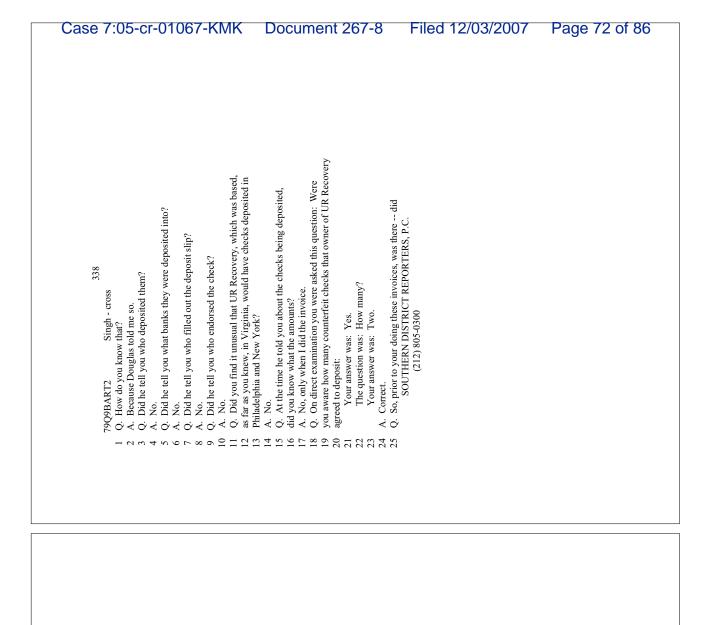
A. My Virginia deal is to come through soon. Q. Oh, he said the Viroinia Am¹⁹

Q. And then how long after that did you actually hear the name

SOUTHERN DISTRICT REPORTERS, P.C.

UR Recovery?
A. A few weeks after that.

(212) 805-0300



Recovery checks were deposited in Philadelphia and New York; is

SOUTHERN DISTRICT REPORTERS, P.C.

A. Yeah.

(212) 805-0300

Q. You testified, I believe, on direct examination that the UR

A. No, not at that time. I only knew of two checks when he

asked me to do the invoice.

that they were going to take -- have two checks deposited?

Q. And when he told you about UR Recovery, did he tell you

How about with Moonlight Productions?

ĄÖ

Not that I know.

To your knowledge, did Douglas have any direct dealings

A. I would say Douglas -- um, Toybe.

with UR Recovery?

Ö

Q. Do you know where Douglas go that information from?

Q. Well, did you hear about UR Recovery being a credit repair

fake invoices for UR Recovery, that she's requesting two fake

Singh - cross

79Q9BART2

invoices.

337

conversation was said to -- Douglas had that conversation with me and that's what he said, they are a credit repair company.

A. Prior to me actually writing the invoice up, that

business prior to the invoice discussion?

Q. And that's the very first time you found out that UR

Recovery was a credit repair company?

A. Yeah.

Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 73 of 86 Q. When were these checks deposited? When did you learn these Q. And in that same conversation did he tell you that the checks had been deposited in Virginia -- I mean in Pennsylvania business accounts. Who gave you the information to write that A. No. That's my -- what I assumed. No one told me that they Q. The invoices that you made up, they talk a lot about credit A. Douglas told me that UR Recovery did repairs of people's that the woman from UR Recovery, she needs these invoices Q. You didn't know the checks were deposited prior to that? A. When I was asked to do the invoices, Douglas said to me before she release the balance of the money. So I learned at and businesses' credit. And I took that and tried to put an repair services, credits services for personal accounts and Q. So that was an assumption, not a statement of fact? invoice together the best I could.
SOUTHERN DISTRICT REPORTERS, P.C. A. After -- after -- before I did the invoices. 340 that time that the checks were deposited. Singh - cross (212) 805-0300 Q. And when would that be? checks were deposited? deposited the checks. and New York? on the invoice? A. Correct.

you learn that the owner of UR Recovery only wanted to do two

79Q9BART2

checks?

A. I don't know if she only wanted to do two checks. I was just told two checks, this is the amount, create an invoice to

reflect this amount.

THE COURT: Yes. Sustained. The jury was here. They

Q. Did Douglas tell you that both Toybe and himself had

heard the testimony. Go ahead.

Q. Correct?

Q. But the impression that you gave in your testimony the other day was that the owner agreed to deposit two checks. MS. PERRY: Objection, form.

Q. Did you not say on your direct examination in answer to the THE WITNESS: No. He did not tell me who deposited

the checks.

question: Who deposited those checks?

That's your testimony? "A. Toybe and Douglas."

Q. Was that mistaken?

A. Yes.

SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

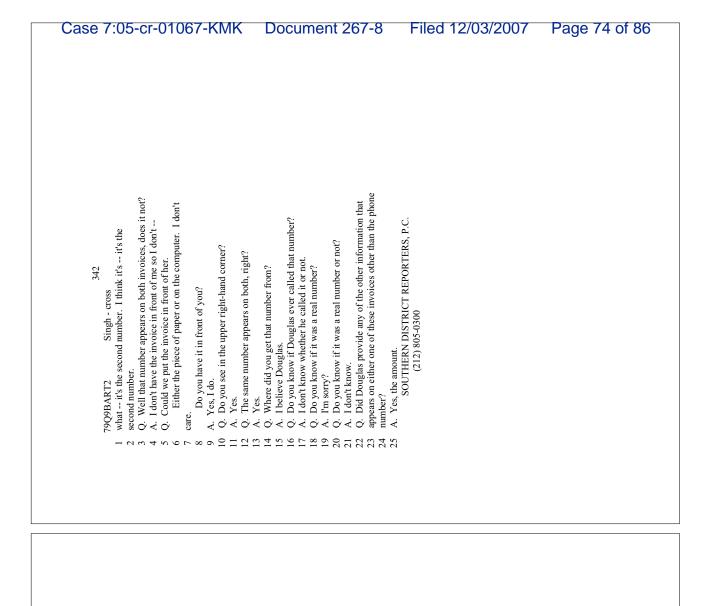
deposited the UR Recovery checks?

MS. PERRY: Asked and answered, your Honor.

MR. STOLAR: Sorry?

MS. PERRY: Asked and answered.

THE COURT: No. Go ahead. Answer it if you can.



A. Correct.
Q. Did you think that an invoice would hold up -- that some company would pay six months in advance \$160,000 for work that

A. Sir, it wasn't much thought given to this invoice. I did

hasn't been done yet?

it to the best I could. It's silly, I understand that, but I did it to the best I could. I wasn't an expert in really A. One of the numbers I got from Douglas. I don't know SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. The telephone number that you put on the invoices,

writing invoices.

(804)343-0033, where did you get that number?

to what you wrote on the invoice, and that the work was to be

completed in May of 2005?

A. Mm-hmm.
Q. That was paid fully at the time of the invoice, according

Q. And on these invoices you've got people paying six months in advance for work that hasn't been done yet, correct? A. Well, to my understanding credit takes a couple of months

to clear on your account, to get repaired. So that's why it

So, for example, one of the invoices that was to Christopher Owens, the CEO, for the \$160,000?

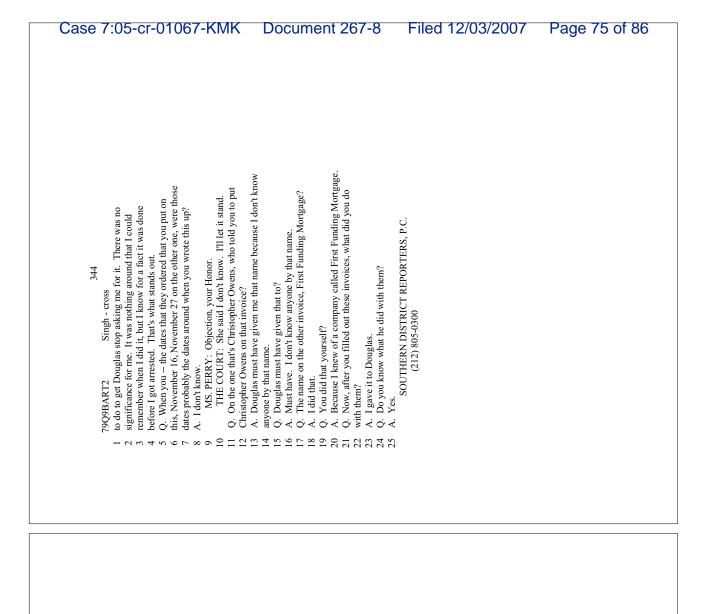
was six months.

Q. So you made up the language that appears on the invoices

all by yourself?

Singh - cross

7909BART2



Q. Now, he told you to put November 16 on one and November 27 on the other?

343

Singh - cross

79Q9BART2 Q. Anything else? A. And a date. THE WITNESS: The Pennsylvania invoice was done after these two, that I know for sure. The Pennsylvania invoice was

MS. PERRY: Objection -- sorry.

Pennsylvania case?

Right. Now, these two invoices, had you ever prepared

prepared after I was arrested.

other invoices that were similar in connection with your

fraudulent scheme?

A. No.

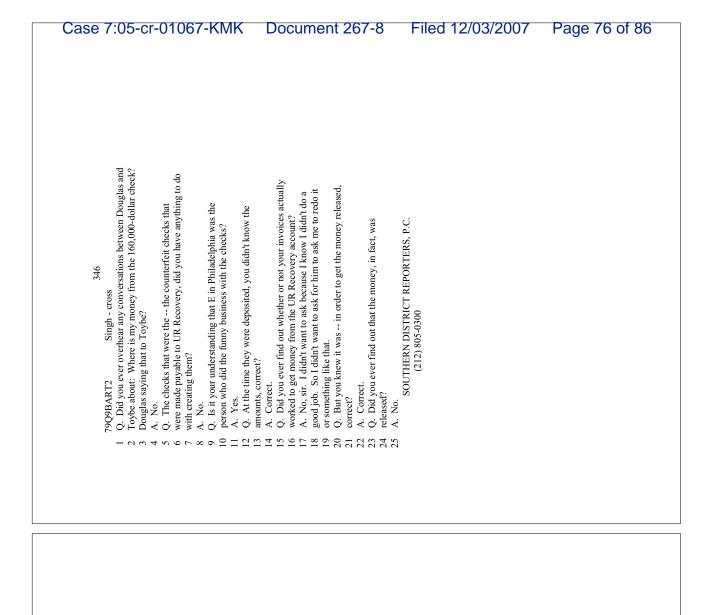
So, these are the only two you prepared?

Q. Can you now fix on the date when they were prepared? A. No, sir, because it was -- it was something I just wanted SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

A. I don't remember. Q. Well, had you ever done invoices before aside from your

A. Yes.
Q. And when did you actually write up these invoices?
A. I don't remember exactly when.
Q. Was it around November 16 or around November 27?
A. I don't know. I don't think so.
Q. Was it after that?



A. I found out there was a problem with the UR Recovery checks

when Douglas was insisting that I make these invoices up Q. The invoices were to get the money released, right?

Q. In early December, 2004, did you find out that there was a

problem with the UR Recovery checks?

O. Do you know to whom he addressed his Federal Express?
A. No, sir.
O. Do you know what address he used?
A. No.
O. Did he ever tell you?
A. No.

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Singh - cross

79Q9BART2

Q. What? A. He Federal Expressed it to Virginia. Q. Did you ever hear that the account, the UR Recovery account was frozen in early December and the 160,000-dollar check was

That was your understanding?

A. Yes. Q. That SOUTHERN DISTRICT REPORTERS, P.C.

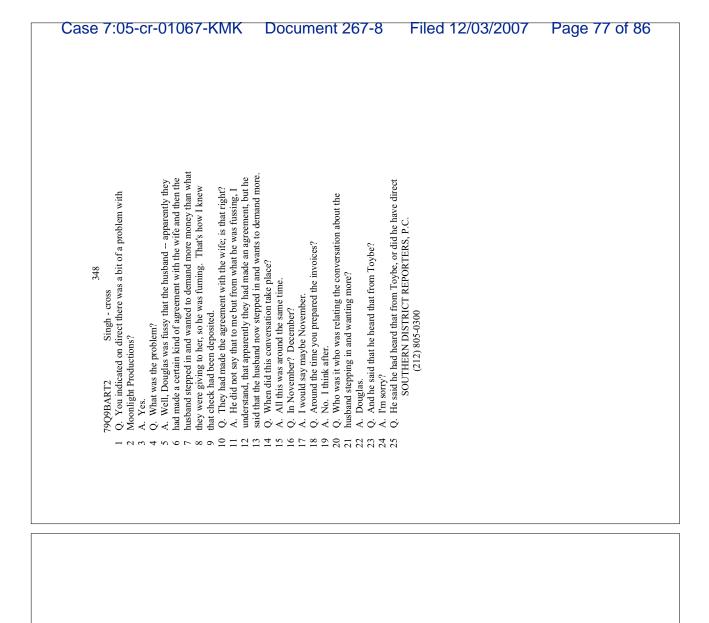
(212) 805-0300

That never made it back to you?

returned as counterfeit?

Q. And that the woman -- the owner of the place would release the money when she got the invoices, correct?

A. Correct.



A. From my understanding it was Toybe who was the broker.

Productions?

Q. And Moonlight Productions was also in Virginia? A. Yes. SOUTHERN DISTRICT REPORTERS, P.C.

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Who was it that was handling the checks with Moonlight

Were you aware of where the checks were deposited?

Q. Were you aware of any checks that were being deposited to

Moonlight Productions' account?

A. Yes.

Q. When did you become aware of that? Were you aware of any amounts? Were you aware of any numbers?

Around the same time.

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Q. Did you ever do any checks with Moonlight Productions?

Q. Not one? A. No.

A. No.

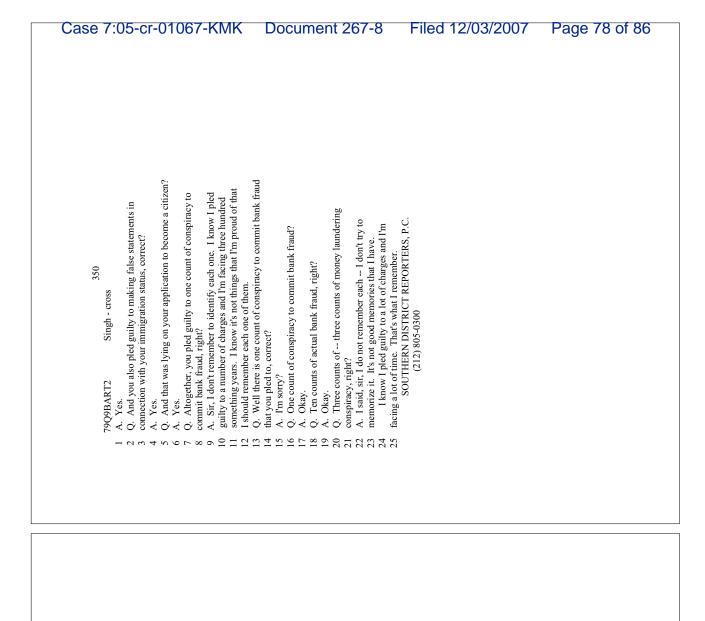
A. No.

Q. Did you ever have any discussions with Douglas or Toybe

about UR Recovery after you filled out these invoices?

Q. Did you ever find out that the money was not released?

Singh - cross



Q. And you could get up to 20 years maximum on each one of

Q. A number of counts of that, correct?

those money laundering counts, couldn't you? SOUTHERN DISTRICT REPORTERS, P.C.

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A. No. He hang up the phone. He was talking to Toybe. And

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Singh - cross

7909BART2

knowledge?

Q. Now, you pled guilty in connection with a cooperation

gentlemen. Thank you.

agreement to a number of charges, correct?

A. Yes, sir. Q. Among t A. Yes, sir.

MR. STOLAR: You can take down the invoices,

that's what he said when he hang up the phone.

Q. You also pled guilty to a number of counts of bank fraud,

the substantive crime?

A. Yes, sir.

Q. For which you can get a maximum of 30 years in jail?

Among them were conspiracy to commit bank fraud?

A. Yes, sir. Q. And each one of which, of those can get you 30 years in

Q. You also pled guilty to conspiracy to launder money,

A. Yes, sir.

jail?

correct? A. Yes. Case 7:05-cr-01067-KMK Document 267-8 Filed 12/03/2007 Page 79 of 86 Q. Now you know that's what's called a 5K1 letter?A. Yes.Q. Do you think that if the government writes a 5K1 letter for you they will not include your help in this case -- one way or as a cooperating witness is that you're hoping the government Q. Hopefully the government will write a letter saying: Judge, this witness has provided substantial assistance to the government. And that way the judge can give you a vastly heart or if they feeling emotional. I don't know. I've done a cooperation agreement does apply for your testimony in this A. Sir, like I said earlier, it was my understanding that that was for the case in August of 2005. That's why I testified. the other, whatever the verdict in this case -- do you think A. I don't know. All I could go by is the fact that when I anything for this. So, I don't know, the goodness of their they won't include the fact that you testified as a witness sign something that's what holds up. And I did not sign A. Yes. That's what he said, yes. SOUTHERN DISTRICT REPORTERS, P.C. Q. Well, Mr. Jacobs I think convinced you that your will write a letter to your sentencing judge, correct? Singh - cross reduced sentence; isn't that right? (212) 805-0300 lot of crimes. I don't know. A. I did, yes. here?

your recollection as to how many counts of each of the various

things you pled guilty to. Does that help?

Q. One count of conspiracy to commit bank fraud? A. Yes. Q. Ten counts of bank fraud?

will show you what's marked as 3512B and see if it refreshes

Q. Well, let's see if we can refresh your recollection. I

Singh - cross

Three counts of conspiracy to commit money laundering?

MS. PERRY: Objection.

A. Yes.

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THE COURT: No. I'll permit it.

THE WITNESS: Yes.

And one count of lying on your immigration application?

Q. The maximum that you could get in jail is 365 years.

A total of 14 counts?

Yes. Yes. correct? A. Yes.

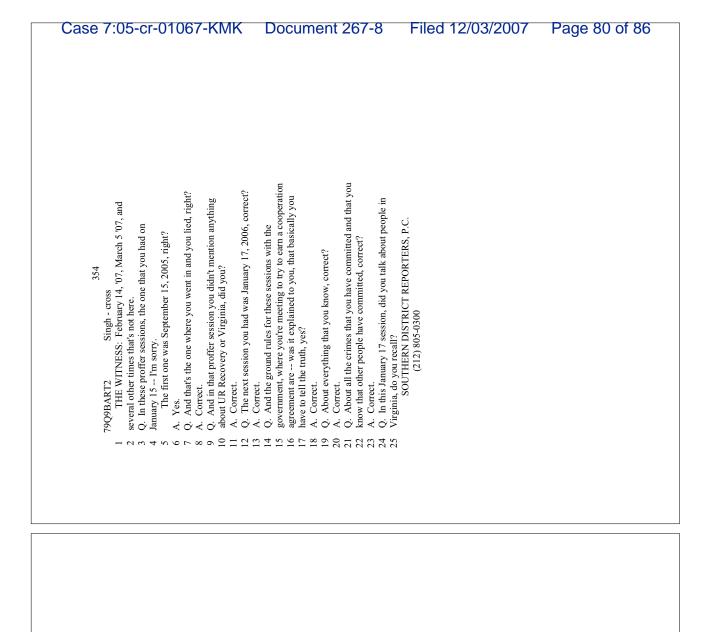
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But you don't expect to get that, do you?

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A. I don't expect to live that long.

Q. Sorry?
 A. I don't expect to live that long.
 Q. You certainly — one of the reasons that you're testifying SOUTHERN DISTRICT REPORTERS, P.C.



MS. PERRY: Objection to reading from the document not

February 2, 2007, February 14.

in evidence. If it refreshes --

THE COURT: No. Go ahead.
SOUTHERN DISTRICT REPORTERS, P.C.

(212) 805-0300

Q. And how many other sessions did you have with them? A. Several of them. Q. What dates? Do you remember?

Q. Now, in order to get this cooperation agreement, you had to go through a series of meetings with the government, which you understood to be called proffer sessions, correct?

A. Yes, sir. Q. And the very first proffer session you had with the

government, you lied, right?

Q. So you do expect that the government, in writing the 5Kl letter, will include your testimony here?

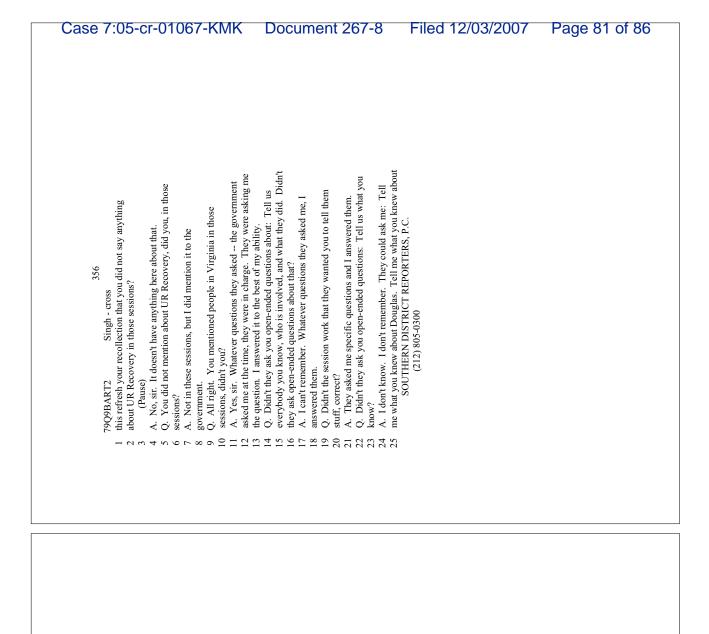
Singh - cross

A. Yes, considering what Mr. Jacobs said.

A. Yes, sir.
Q. How about in the second proffer session?
A. I don't remember what happened the second proffer session.
Q. January 17, 2006. Was that the second time you went and talked to them?

A. I don't remember the date. Q. I show you what's marked as 3512B and see if it refreshes

your recollection.
A. Yes.



Q. How about on the February 14 session, you didn't mention UR

A. I don't remember what date I said what. But I do know and I do remember I mentioned it to the government.

A. Sir, I said I don't know.
Q. How about in the February 2? You didn't say a word about

UR Recovery, did you?

Q. In the February 2 session where you were agreeing to tell the whole truth, you didn't say a word about UR Recovery, did

A. I don't recall every session. The conversation was very

long. It was very long. It was very intense. I don't

remember.

Sir, I did not remember what the conversation was, what

date. It was a few times -- several times, sometimes all day,

Q. Is it not true that in the January 17 session you didn't

say a word about UR Recovery?

sometimes -- very long. I don't remember.

Q. Or on the March 5 session, you didn't mention UR Recovery,

A. Sir, I don't remember.

did you? A. Sir, I

Recovery, did you?

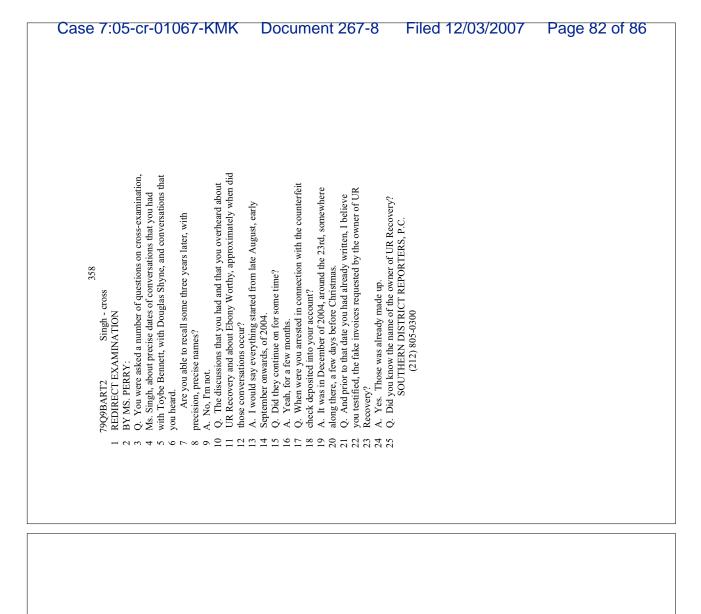
Sir, I don't remember what date I mentioned it, but I did

Q. I'm going to ask you to read 3512F, 3512G, 3512H, and 3512I

mention it to the government.

and ask you the question I'm going to ask you at the end, does SOUTHERN DISTRICT REPORTERS, P.C.

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THE COURT: They were here to hear it. Next question.

MS. PERRY: Your Honor, I do have some redirect. I MR. STOLAR: There are no further questions, Judge.

don't know if you'd like me to do it --THE COURT: Short, I hope.

THE COURT: Okay. Call your next witness.

MS. PERRY: It's fairly short, your Honor. Should I

do it now?

THE COURT: Yes. SOUTHERN DISTRICT REPORTERS, P.C.

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Q. So prior to your signing the agreement and pleading guilty

they took it or not, I don't remember, sir, but I mentioned it

to them.

From what I just read, there is no notes in there. Whether

you had not mentioned UR Recovery; is that correct?

MS. PERRY: Objection. That's not what she just said.

specifically: Tell me what you know about -- I don't remember. Q. You signed your cooperation agreement on March 13, 2007,

approximately?

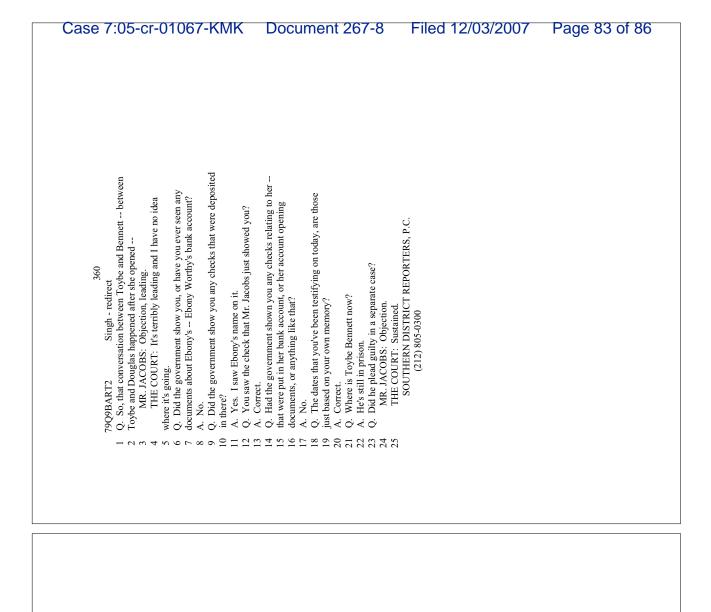
Toybe. You know, things like that. I don't remember

79Q9BART2

A. (No response).
Q. March 19?
A. Correct.
Q. Up until March 19, 2007, you hadn't said a word about UR

A. I said to the government. I don't remember when I said it.

Recovery, had you?



between Douglas and Toybe about putting a counterfeit check

into Ebony Worthy's account?

You testified -- you've testified about a conversation

Q. You were asked a question by Mr. Jacobs about sort of a hypothetical, if Ebony Worthy had opened an account

A. No.

November 19, could the conversation that -- I'm sorry.

Withdrawn.

A. No. Q. Did you know the names of the owners of Moonlight Productions?

Singh - redirect

79Q9BART2

She hasn't had it for very long, not much money in there,

A. Correct.
Q. And Douglas asked Toybe what her account was like?
A. Correct.
Q. And what did Toybe say in response?
A. She hasn't had it for very long, not much money in ther

What kind of money did Toybe Bennett put into Ebony

he just put some money in there.

Worthy's account?

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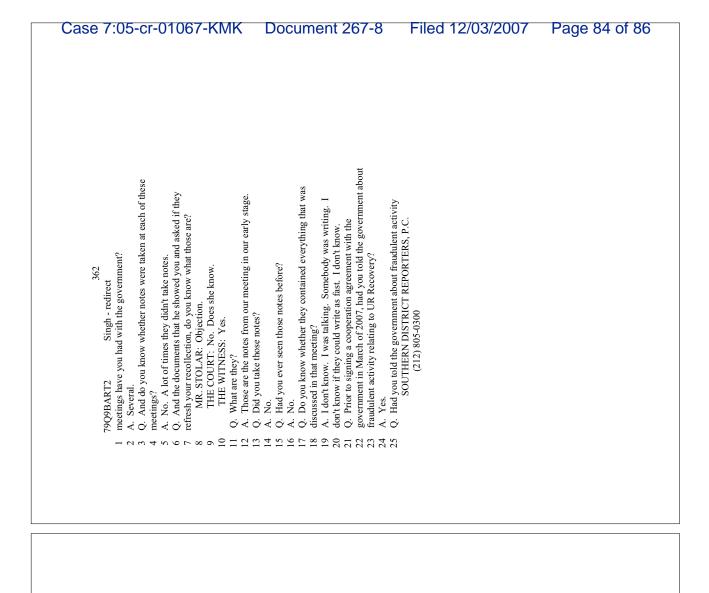
A. I don't know.
 Q. What kind of money did Toybe Bennett have access to?

Q. Did he have any access to legitimate money that you're

A. Fraudulent money.

A. No. He didn't have a job. SOUTHERN DISTRICT REPORTERS, P.C.

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Q. You were just asked some questions by Mr. Stolar about what

THE COURT: Yes. Has nothing to do with the cross.

MR. JACOBS: Objection. Improper redirect.

that she was putting bad checks in for him?

you told the government and when you told them. How many SOUTHERN DISTRICT REPORTERS, P.C.

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Q. Did Toybe ever tell you whether his girlfriend, Donna, knew

MR. JACOBS: Objection. THE COURT: Sustained

checks were bad?

A. Both. Q. To vom

know?

To your knowledge, did these people do so knowing that the

Montgomery. You testified on direct about a girlfriend of his, associated with Toybe Bennett who had deposited checks into

Donna.

their account. You talked about a Jason Watler, Roberto You testified on cross about numerous individuals

checks, or did they put counterfeit checks themselves, if you

Are these all people who put proceeds of counterfeit

MS. PERRY: Well, Mr. Jacobs asked a question about --

MS. PERRY: I'll move on.

THE COURT: No. No. THE COURT: No.

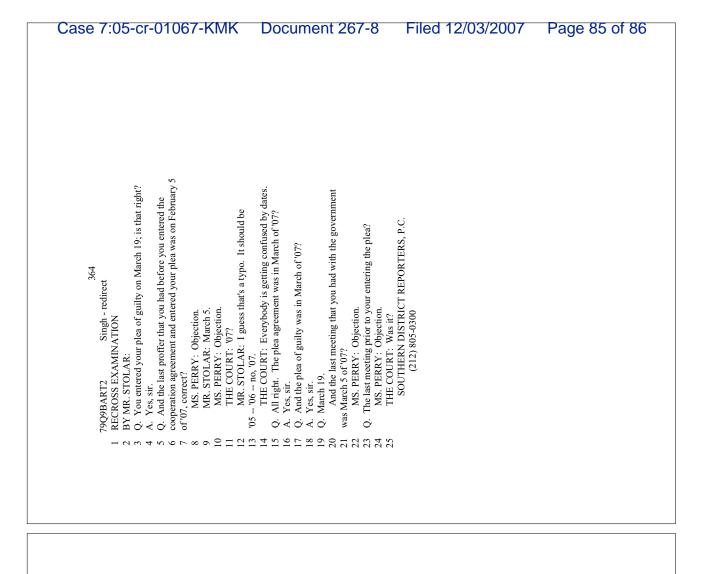
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MR. JACOBS: Nothing to do with cross.

THE COURT: Sustained.

Singh - redirect

79O9BART2



Recovery, Moonlight, and also I mentioned about Toybe involving

friends, family, and girlfriends.

A. I mentioned to the government that they did deals with UR

Q. What names did you tell the government?

Q. When you were asked specific questions by the government about people's names, did you answer those questions at that

A. Yes, whatever the government asked me, whatever name, I

MS. PERRY: I think I'm done, your Honor, just one

Q. Whether or not -- withdrawn.

gave, yeah.

point?

MS. PERRY: No further questions, your Honor. MR. JACOBS: No recross, your Honor. SOUTHERN DISTRICT REPORTERS, P.C.

(Pause)

minute.

(212) 805-0300

MR. JACOBS: Objection. The answer is did you mention

THE COURT: Yes. And she said yes. THE COURT: Okay. Next question.

any names. Yes or no.

THE WITNESS: Yes.

A. I told the government about UR Recovery

 $Q.\;$ Did you tell the government specifically and did you mention any names?

relating to people associated with Toybe Bennett?

Singh - redirect

7909BART2

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(Witness excused)
THE COURT: Do you have your next witness? Yes? No?
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                                                                                                                                                                                                                                          that you gave me.

Q. But the notes that you read here make no mention of UR Recovery, did they?

A. No, I did not read anything on it.
Q. Even though UR Recovery is the company that had you done the invoices for, right?
                                                                                                                    Q. Prior to your entering a plea of guilty to the 14 counts that you pled guilty to, you had not mentioned UR Recovery to
                                                                                                                                                                                  A. Sir, I mentioned it to the government. Around what time, I
                                                                                                                                                                                                                                                                                                                                                             A. Correct, and I mentioned it to the government.
Q. But you didn't see it in the notes, did you?
A. No. Maybe they were just writing down what they had
                                                                             THE COURT: Yeah. Was it the last meeting? THE WITNESS: I don't know, sir. I don't believe so.
                                                                                                                                                                                                   don't know. But I also noticed several times I met with the
                                                                                                                                                                                                                      government and they don't have it written there, that paper
                                     THE COURT: Was it the last meeting?
                                                            THE WITNESS: Should I answer?
                                                                                                                                                                                                                                                                                                                                                                                                                                                MR. STOLAR: Thank you.
THE COURT: Okay. All right.
                 MR. STOLAR: Was it.
                                                                                                                                                               the government, had you?
                                                                                                                                                                                                                                                                                                                                                                                                                             interest in. I don't know.
79Q9BART2
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